UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

February 28, 2013

MEMORANDUM

SUBJECT: Industrial User - Compliance Evaluation Inspection Report – Canton Drop Forge, Canton, Ohio

FROM: Mark Moloney, Environmental Engineer

THRU: Mark Conti, Technical Team Leader
OECA, Cleveland Office (ME-W)

TO: Barbara VanTil, Section 1 Chief, WC-15J

Attached is a copy of the industrial user - compliance evaluation inspection report for the Canton Drop Forge facility located in Canton, Ohio. This inspection was conducted as part of a multimedia inspection performed at the facility from August 6 through August 8, 2012. During the multimedia inspection it was determined that process wastewater was being discharged from the plant to the sanitary sewer. Although aware of process discharges from Canton Drop Forge, no industrial user discharge permit has been issued to the company by Stark County Metropolitan Sewer District.

If you have any questions regarding this inspection report please contact me at 440-250-1709.

Attachment.

pc. Brooke Fujio, ME-W
~~Alan Walts, E-19J~~ w/o attachment

CONCURRENCES								
SYMBOL								
SURNAME	MM							
DATE	2/28/13							

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

CLEAN WATER ACT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

MULTIMEDIA COMPLIANCE INVESTIGATION

CANTON DROP FORGE

Facility Address:
4575 Southway Street S.W.
Canton, OH 44706

Investigation Dates
August 6 – 8, 2012

Investigator:
Mark Moloney, Environmental Engineer, USEPA

Canton Drop Forge Representatives:
Brad Ahbe, President
Sean Denman, Environmental Health and Safety Manager
Keith Houseknecht, Retired Plant Process Engineer

CONTENTS

APPENDICES

MEDIA REPORT

Canton Drop Forge develops and manufactures closed die forgings in Canton, OH. Bars of steel in various shapes and diameters are heated and placed into a die cavity where they are formed into the various shapes and parts. Dies are manufactured onsite. CDF supplies forgings to a variety of industries including transportation, aerospace, construction, oil field services and power generation. CDF is categorized under the North American Industry Classification System (NAICS) code 332111, "Iron and Steel Forgings." The corresponding SIC code is 3462. Region V personnel conducted a multimedia inspection at the Canton Drop Forge facility on August 6-8, 2012. This report, one of a series that addresses investigation findings, discusses Clean Water Act (CWA) issues.

REGULATORY SUMMARY

Canton Drop Forge discharges process wastewaters to the City of Massilon's sewer system. Massilon has issued no industrial user permit to the facility.

ON-SITE INSPECTION SUMMARY

Credentials were presented to Sean Denman following an introductory meeting on August 6, 2012. On August 6-8, 2012, Brad Ahbe, President, Sean Denman, Safety Director and Keith Houseknecht, Retired Plant Process Engineer of Canton Drop Forge described the company's process operations followed by a general tour of the process areas. Wastewater sources and treatment were discussed with the company and associated files were reviewed on August 7 and 8, 2012. An exit conference between regulatory and company personnel was also conducted on August 8, 2012 to discuss preliminary inspection findings.

Facility

Canton Drop Forge (CDF) develops and manufactures closed die forgings in Canton, Ohio. The facility is located at 4575 Southway Street on a 25 acre site sown in Figure 1. Operations onsite involve forging bars of steel in various shapes and diameters by heating the feedstock and placing into a die cavity where it is formed into the shape of the die by steam driven hammers. CDF supplies products for the locomotive, aerospace and power generation industries.

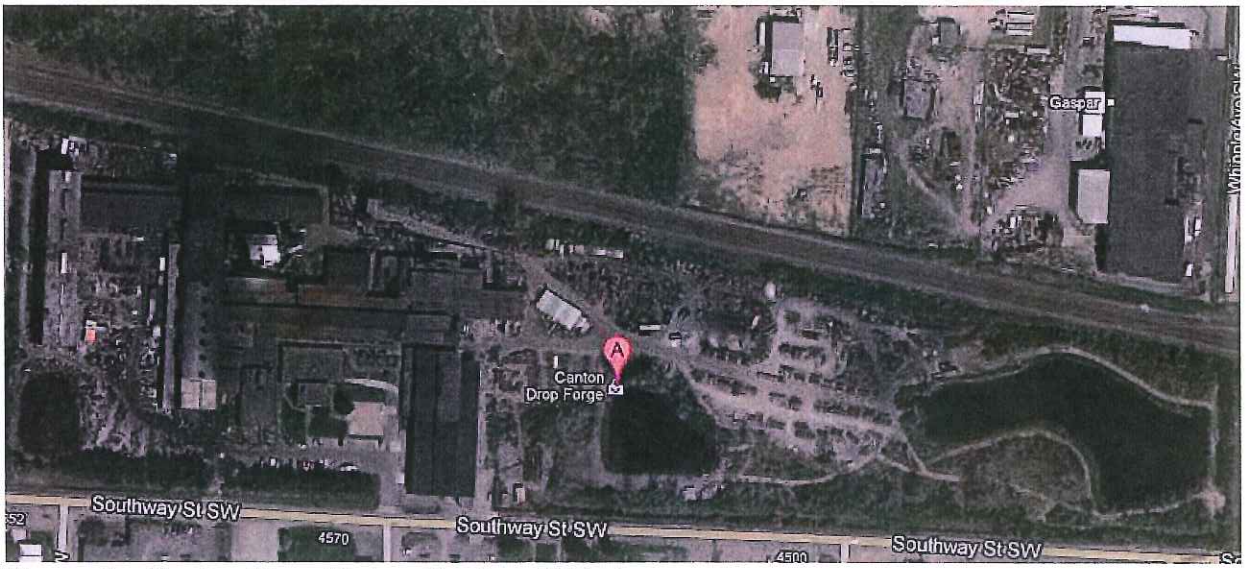


Figure 1 - Canton Drop Forge, Canton, Ohio

The CDF plant was designed and built by the U.S. Government in 1942. The plant was used to forge airplane propeller hubs. CDF operated the site until purchasing the plant from the U.S. Government in the early 1950's. Since the early 1950's CDF has manufactured drop forge parts at the site.

Canton Drop Forge, Inc. develops and manufactures closed die forgings. It offers closed die forgings for fixed-wing commercial and military aircraft, helicopters, and missiles; and for locomotive engines, traction motors, and undercarriage components for passenger railcars. The company also provides shafts, valve bodies, connecting rods, and other pump components; and blades, vanes, shafts, and discs for medium to large steam and gas turbine engines. It serves aerospace, locomotive, oilfield, and power generation customers. Canton Drop Forge, Inc. was formerly known as The Canton Drop Forging and Manufacturing Company and changed its name to Canton Drop Forge, Inc. in June 1987. Canton Drop Forge, Inc. was founded in 1903 and is based in Canton, Ohio. The company operates as a subsidiary of Engineering Materials, Inc. James O'Sullivan is the principal owner of the privately held company.

The manufacturing process begins with selection of feedstock which typically consist of steel alloys containing carbon, nickel and titanium. The feedstock is cut to size and heated to between 1700 and 2400 degrees Fahrenheit. A steam driven hammer forges the piece into the shape of the die. Lubricating oils are used to coat the dies. The drop forged product may be heat-treated, cooled by quench oils and/or cleaned by shot blasting or grit cleaning. After the testing the parts are shipped to the various customers.

Process units/areas at the CDF facility include:

Boilers
Rotary Furnaces
Box Furnaces
Steam Operated Hammers
Heat Treat Furnaces
Shot Blasting Units
Grinding Machines
Die Washing
Oil Quench Tanks
Part Washers
Die Polishing

Plant site sketches showing the locations of these areas are attached to this report as Appendix 1.

Water Use, Waste Water/Industrial Storm Water Flows

CDF utilizes water for process operations and sanitary uses. The company operates two wells on-site to provide process water and water used for employee showers. The company operates a hot process softener and zeolite softeners to treat the well water. Purchased bottle water is used for drinking.

There are three man-made lagoons on the CDF plant site. These lagoons are used to collect and treat the storm water and most of the process wastewaters generated at the site. Pond No. 1 receives storm water from the eastern side of the facility. Pond 2 receives storm water from the western side of the facility and the majority of the process waste water generated by the plant. Process water containing spent lubricating oil is treated in a grit chamber and an oil/water separator located at the south end of the Forge Shop prior to being discharged. This process

wastewater and other wastewater streams from the plant are discharged to Pond No. 2. Pond No. 2 is equipped with an oil skimmer to collect any residual oil prior to the water being discharged to Pond No. 3. Pond No. 3 has no surface discharge. According to company officials water leaves Pond No. 3 by evaporation to the atmosphere or infiltration to the ground. Figure 2 is a schematic of the Wastewater Treatment Pond System at CDF.

In addition to the discharges to the plant Pond system, sanitary wastewater and some process wastewater streams generated at the facility are discharged to the Stark County Metropolitan Sewer District.

The list below lists the wastewater sources at the site and identifies where these sources are discharged:

- Wet scrubber wastewater – The scrubber used to control fly ash emissions from the plant's coal fired boiler discharges wastewater to Pond 2.
- Boiler blowdown (non contact cooling water) - Non-contact cooling water from the three plant boilers is discharged to Pond 2.
- Hot process softener lime sludge filtrate - The company uses a hot process softener to soften raw well water. The lime sludge generated by this process is dewatered using a plate and frame filter press. The filtrate from the press is discharged to the Stark County Metropolitan Sewer District.
- Oil emulsion in steam lines - The forging hammers at the plant are powered by steam. The cylinders on the hammers are lubricated with oil. During hammer operations, the steam becomes contaminated with the oil used to lubricate the hammer piston. The return steam lines contain oil, which is removed in two dropout boxes located along the steam line system. Liquid removed at these dropout boxes is discharged to an oil/water separator. Oil is retained in the separator for off-site disposal and the water is discharged to the Stark County Metropolitan Sewer District.
- Water seals on the rotary furnace - Water is used as a seal on each rotary furnace. After use this water is discharge to Pond 2.
- Steam used for cleaning at the forging hammers and die wash – Steam used at the forging hammers and in the die wash area mixes with the die lube oils and kerosene. These wastewater streams are discharged from the forging shop to the south end oil/water separator. After oil separation the water is discharged to Pond 2. Oil is shipped off-site for disposal.
- Steam used on the box furnaces – Steam used on box furnaces for dust control is discharged to Pond 2.
- Laboratory sink drains and grinding table drains - The sinks in the laboratory and the drains on the grinding tables discharge to the Stark County Metropolitan Sewer District.

Figures 2 and 3 represent the simplified water wastewater flow diagrams for the CDF plant. Figure 2 represents the CDF pond system and Figure 3 represents the process and sanitary discharges tributary to the Stark County Metropolitan Sewer District.

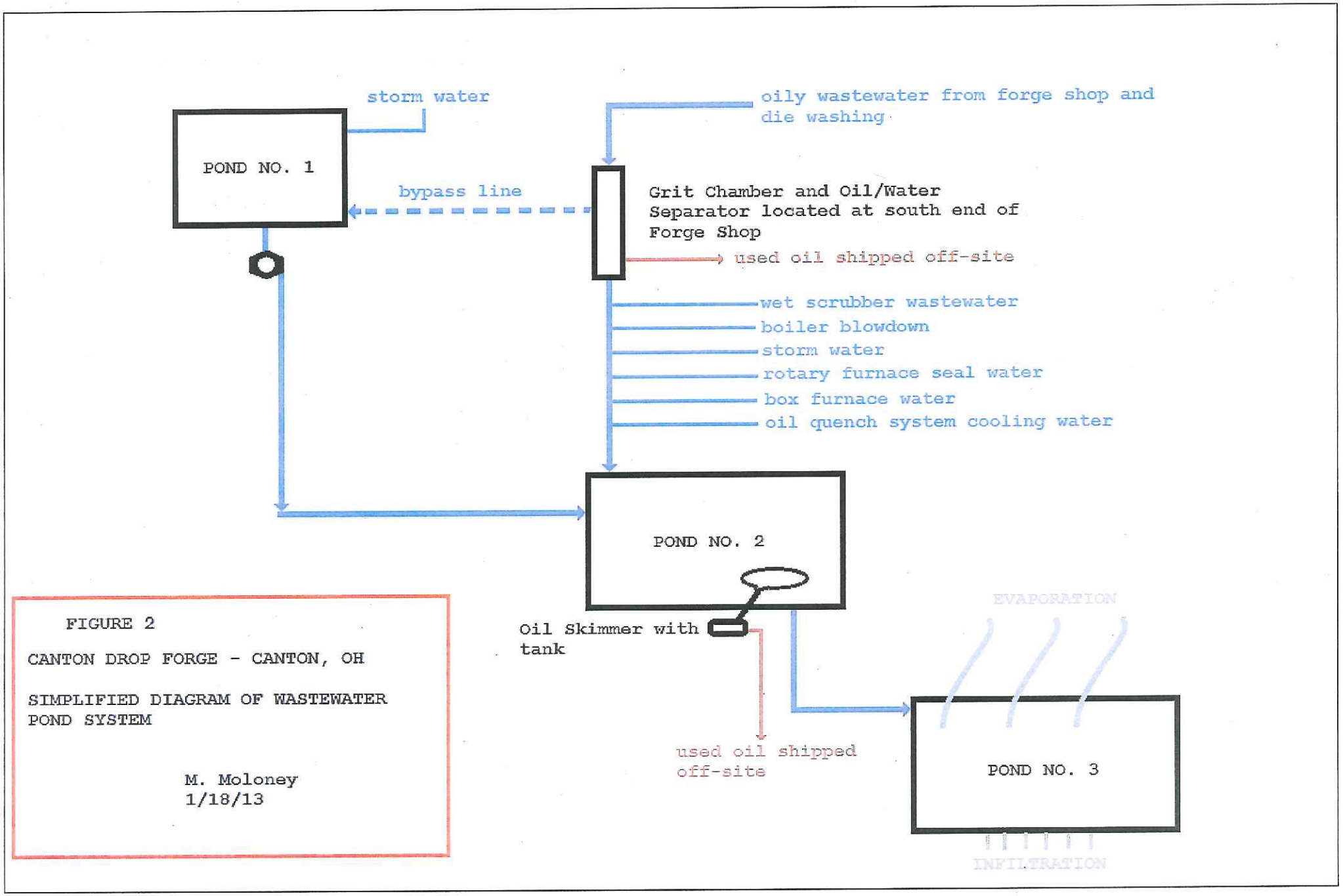


FIGURE 2

CANTON DROP FORGE - CANTON, OH

SIMPLIFIED DIAGRAM OF WASTEWATER POND SYSTEM

M. Moloney
1/18/13

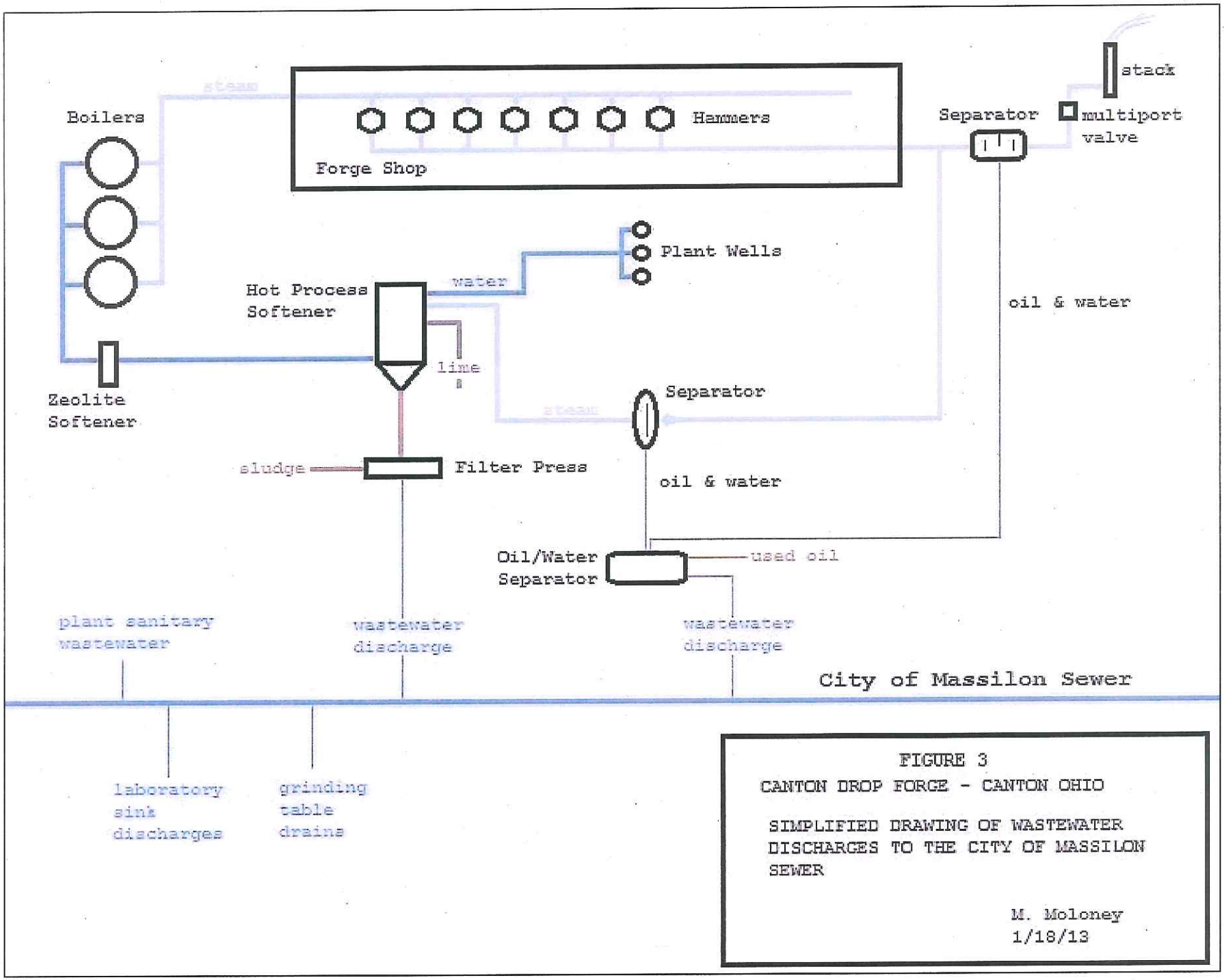


FIGURE 3

CANTON DROP FORGE - CANTON OHIO

SIMPLIFIED DRAWING OF WASTEWATER DISCHARGES TO THE CITY OF MASSILON SEWER

M. Moloney
1/18/13

SPCC Plan

The CDF facility has no SPCC plan. The company claims that because the pond system has no discharge to a waterway, the plant is not subject to SPCC rules.

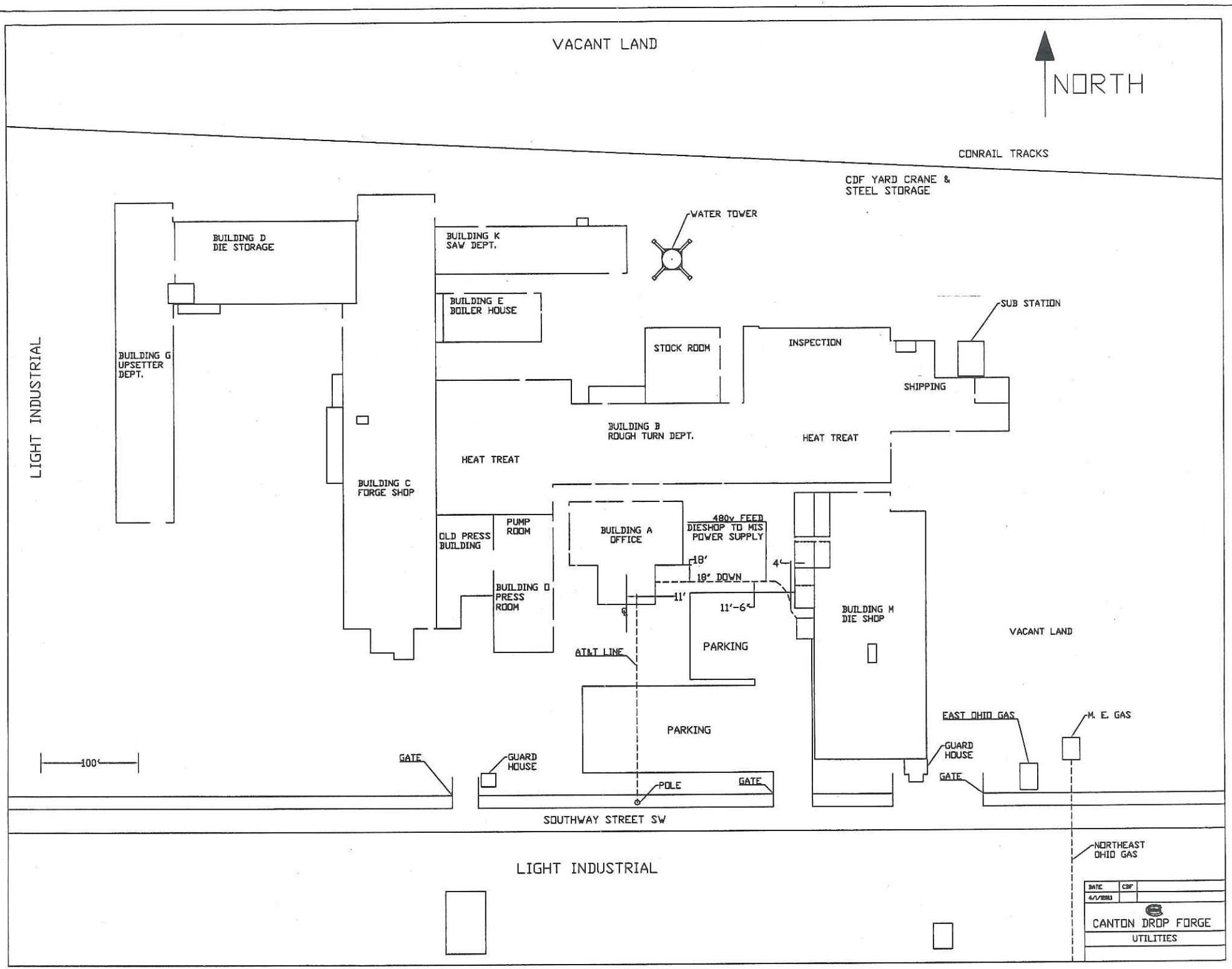
SUMMARY OF FINDINGS

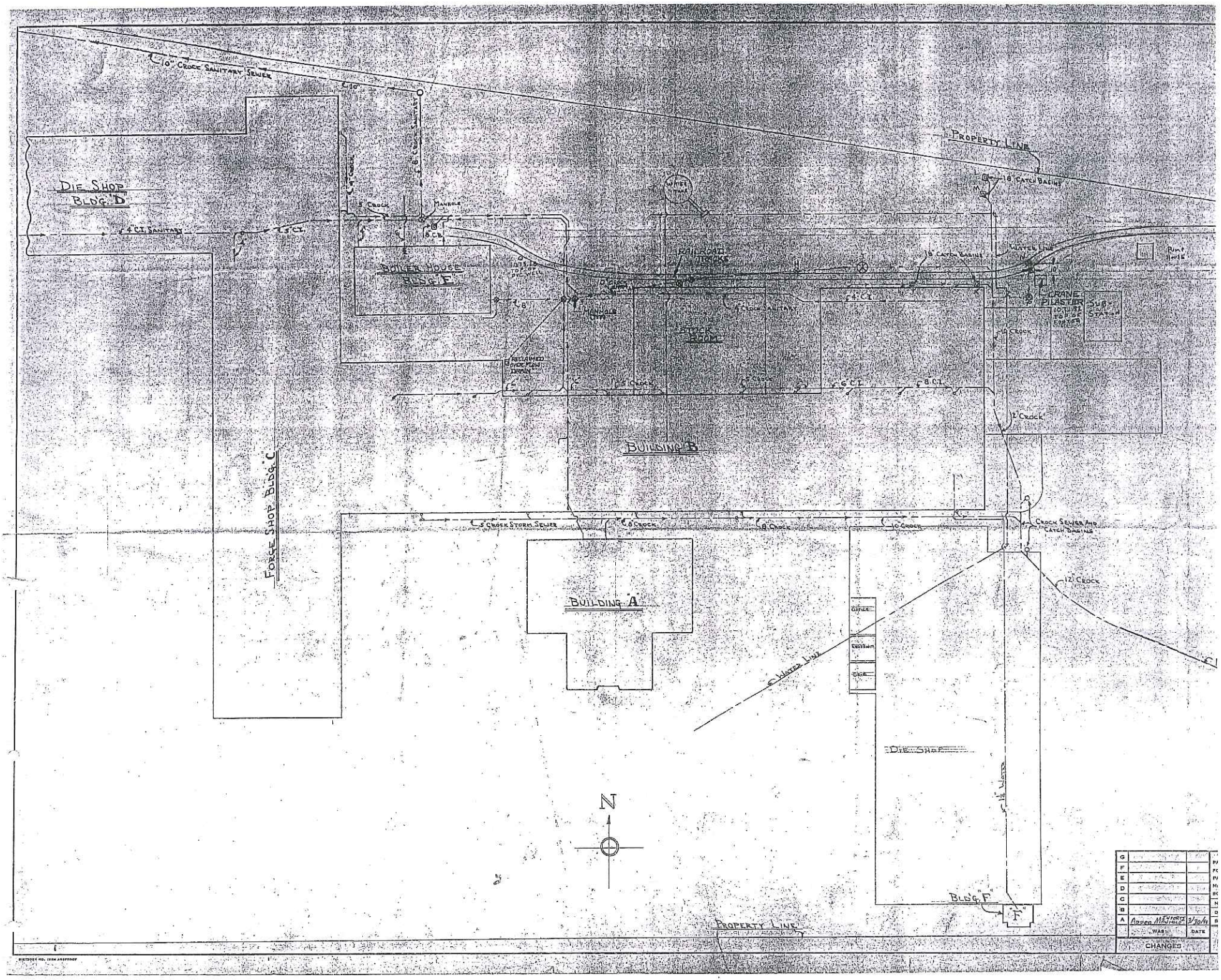
Based on inspection observations, discussions with Canton Drop Forge personnel and review of documentation, the following areas of concern associated with Clean Water Act compliance were identified during the EPA multi-media investigation. These are observations of potential problems/activities that could impact the environment, result in future noncompliance with permit or regulatory requirements, and/or are areas associated with pollution prevention areas.

- During the inspection, it was noted that process wastewater streams from two sources are discharged to the Stark County sanitary sewer system. These wastewater streams include filtrate from a lime filter press associated with the lime water softener and discharges from two plate separators in the plant's steam system which remove oil/ water droplets. The steam line discharges are treated in an oil water separator prior to being discharged to the city sewer. The company provided a December 7, 2009 letter from the Sewer District and a 1/19/10 response letter from CDF that indicates the Stark County Metropolitan Sewer District is aware of the hot process discharge from the plant to the county sewer system. The operation of an oil/water separator to control the discharge to the city sewer from the plant's steam system would indicate there is a potential for the discharge of oil from this source. Neither Stark County nor Ohio EPA has issued an industrial user permit to regulate the process wastewater discharges from Canton Drop Forge.

- The company Tier II 2010 Emergency Chemical Inventory report indicates that the facility has oil storage capacity of approximately 161,350 gallons on-site. This includes: #2 and #6 fuel oil, kerosene, petroleum distillate (lube and hydraulic oil), quench oil and used oil. The company has no SPCC plan for the facility. The company maintains that oil from the site cannot reach a water way. The company claims that the plant site sits in a natural bowl and storm water and any spills would be captured in a series of ponds on site.

Appendix 1


VACANT LAND
NORTH
CONRAIL TRACKS
CDF YARD CRANE &
STEEL STORAGE
WATER TOWER
BUILDING D
DIE STORAGE
BUILDING K
SAW DEPT.
BUILDING E
BOILER HOUSE
SUB STATION
STOCK ROOM
INSPECTION
SHIPPING
BUILDING G
UPSETTER
DEPT.
BUILDING B
ROUGH TURN DEPT.
HEAT TREAT
HEAT TREAT
BUILDING C
FORGE SHOP
LIGHT INDUSTRIAL
OLD PRESS
BUILDING
PUMP
ROOM
BUILDING A
OFFICE
480v FEED
DIESHOP TO MIS
POWER SUPPLY
18'
18" DOWN
4'
11'
11'-6"
BUILDING D
PRESS
ROOM
BUILDING M
DIE SHOP
VACANT LAND
AT&T LINE
PARKING
PARKING
EAST OHIO GAS
M. E. GAS
GUARD
HOUSE
GATE
100'
GATE
GUARD
HOUSE
POLE
GATE
SOUTHWAY STREET SW
NORTHEAST
OHIO GAS
LIGHT INDUSTRIAL
DATE
CDF
CANTON DROP FORGE
UTILITIES



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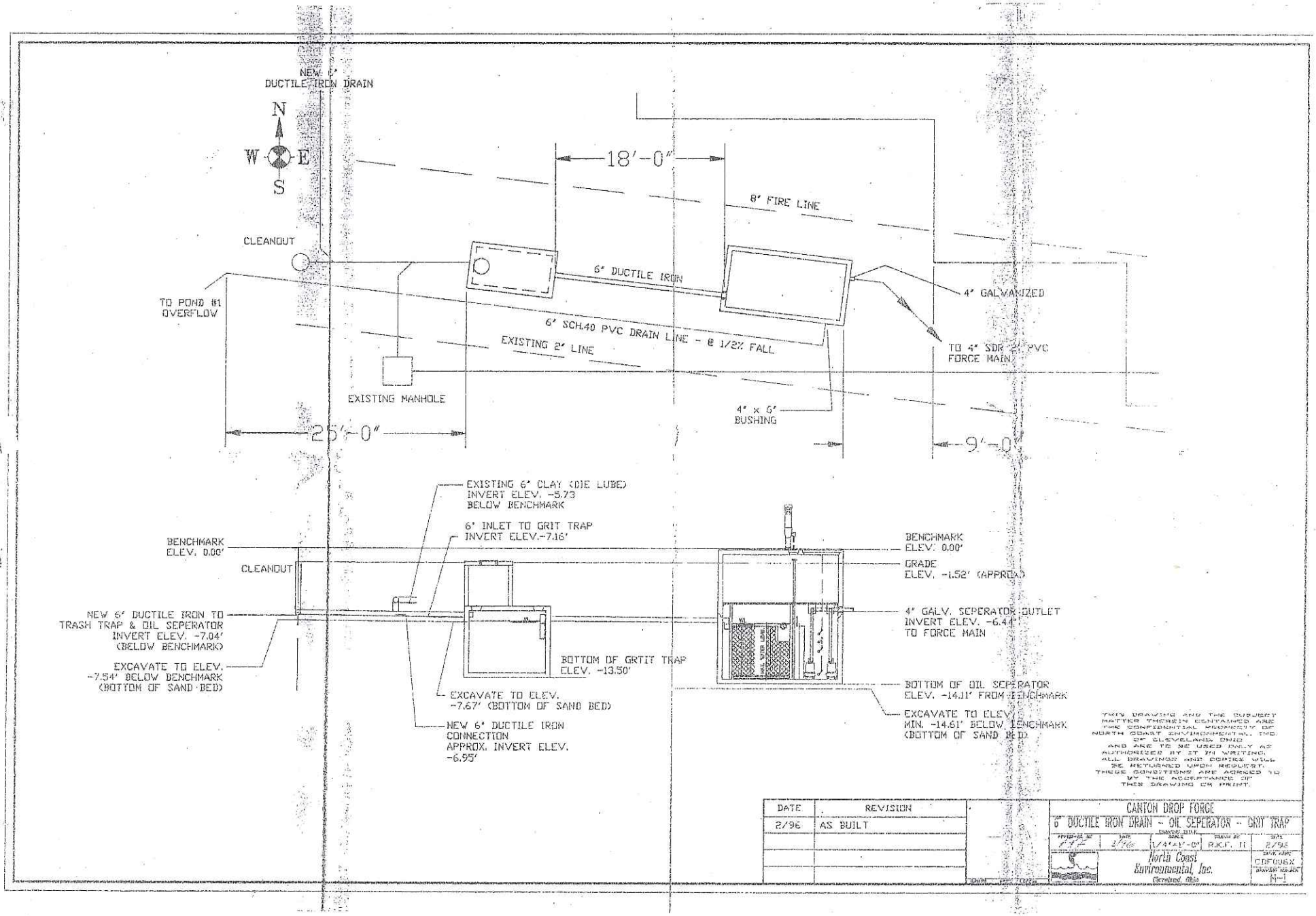
	CHANGES		



THIS DRAWING AND THE SUBJECT MATTER THEREIN CONTAINED ARE THE CONFIDENTIAL PROPERTY OF NORTH COAST ENVIRONMENTAL, INC. OF CLEVELAND, OHIO AND ARE TO BE USED ONLY AS AUTHORIZED BY IT IN WRITING. ALL DRAWINGS AND COPIES WILL BE RETURNED UPON REQUEST. THESE CONDITIONS ARE AGREED TO BY THE ACCEPTANCE OF THIS DRAWING OR PRINT.

DATE	REVISION
2/96	AS BUILT

CANTON DROP FORGE

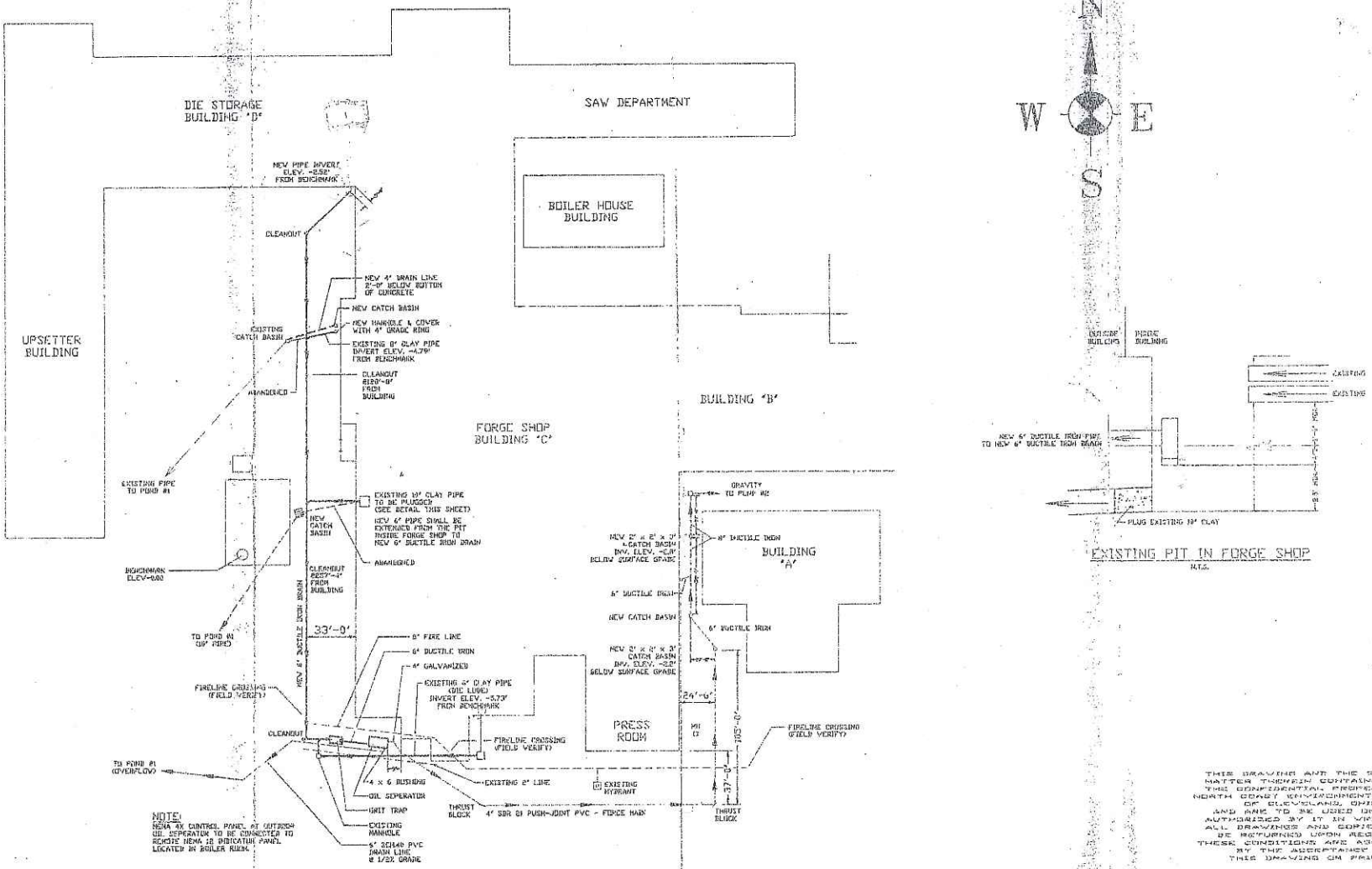
6" DUCTILE IRON DRAIN - OIL SEPERATOR - GRIT TRAP

DRAWN BY	DATE	DRAWING SCALE	CHKD BY	DATE
PJF	2/96	1/4"=1'-0"	R.J.C.F. II	2/96

North Coast Environmental, Inc.
Cleveland, Ohio

DWG. NO. CDF006X

DRAWING SHEET NO. 4-1



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DATE	REVISION
2/96	AS BUILT

CANTON DROP FORGE

NEW 6" DRAIN, GRIT TRAP & OIL SEPERATOR PLAN

DESIGNED BY	DATE	HORIZONTAL SCALE	DRAWN BY	DATE
R.K.F.	9/11/96	1/2"=1'-0"	R.K.F. II	9/11/96

North Coast Environmental, Inc.
Cleveland, Ohio

CDF201X

SHEET NUMBER P1-1

Appendix 2

Photograph No. 1 (file IMG_0246)

Photographer: M. Moloney

Date: 8/7/12

Time: 1337 (EDST)

Description: View of the eastern end of Pond No. 3 at Canton Drop Forge.

Photograph No. 2 (file IMG_0247)

Photographer: M. Moloney

Date: 8/7/12

Time: 1338 (EDST)

Description: View of the eastern end of Pond No. 3 at Canton Drop Forge.

Photograph No. 3 (file IMG_0248)

Photographer: M. Moloney

Date: 8/7/12

Time: 1338 (EDST)

Description: View of the western end of Pond No. 3 at Canton Drop Forge.

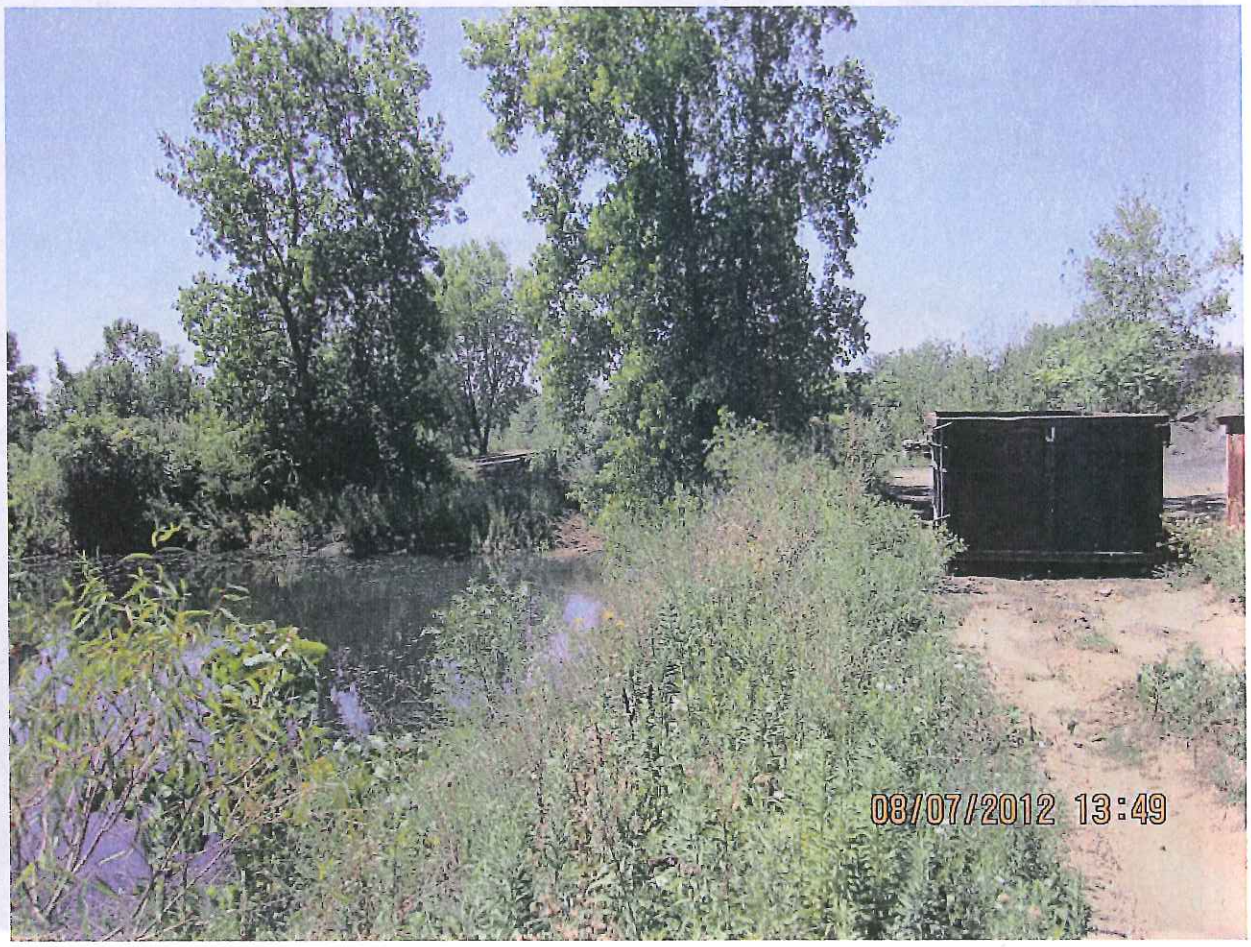
Photograph No. 4 (file IMG_0249)

Photographer: M. Moloney

Date: 8/7/12

Time: 1349 (EDST)

Description: View of the western end of Pond No. 3 at Canton Drop Forge.



Photograph No. 5 (file IMG_0250)

Photographer: M. Moloney

Date: 8/7/12

Time: 1349 (EDST)

Description: View of the eastern end of Pond No. 3 at Canton Drop Forge.

Photograph No. 6 (file IMG_0251)

Photographer: M. Moloney

Date: 8/7/12

Time: 1352 (EDST)

Description: View of the influent wastewater pipe from Pond 2 discharging to the eastern end of Pond No. 3 at Canton Drop Forge.

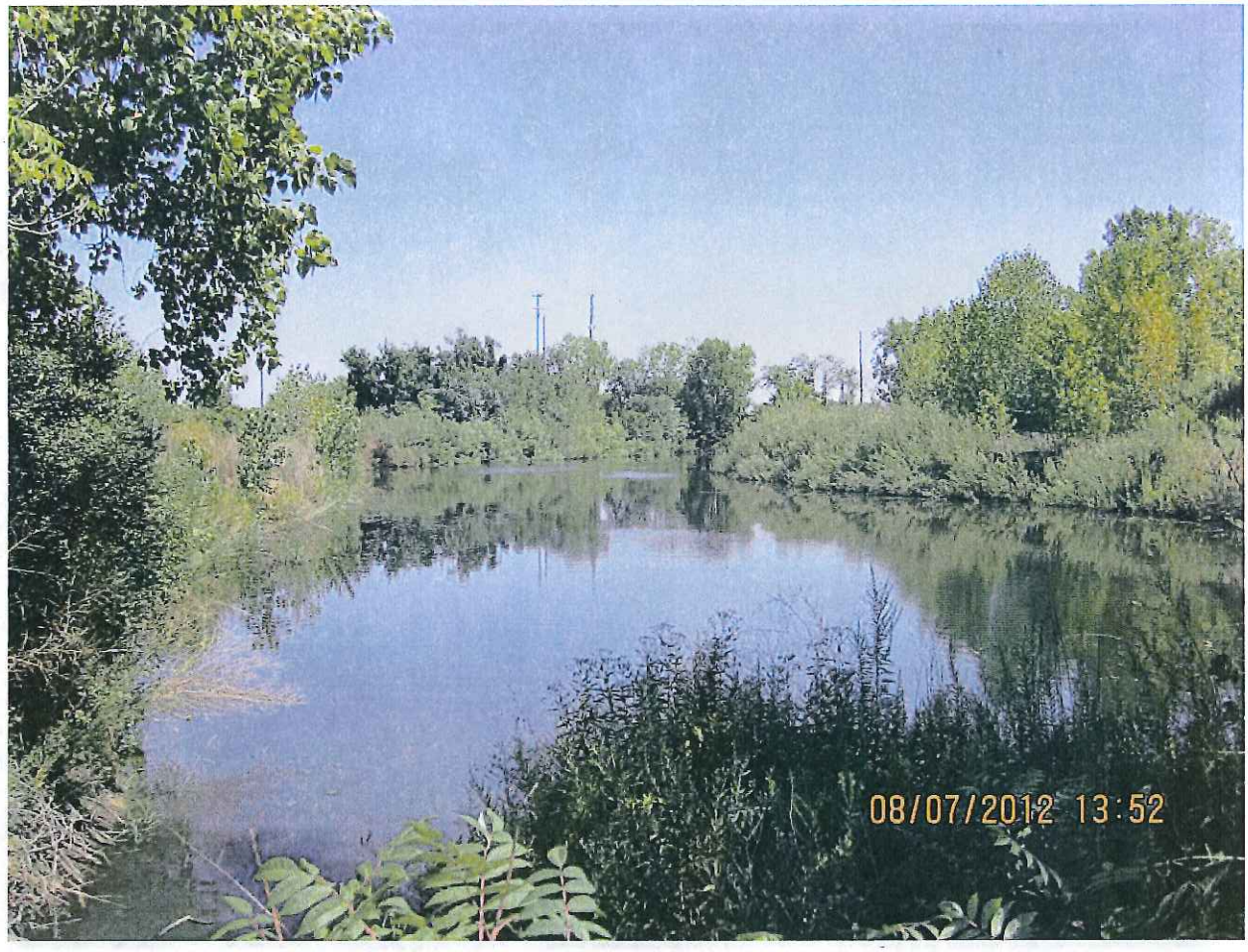
Photograph No. 7 (file IMG_0252)

Photographer: M. Moloney

Date: 8/7/12

Time: 1352 (EDST)

Description: View of the influent wastewater pipe from Pond 2 discharging to the eastern end of Pond No. 3 at Canton Drop Forge.



Photograph No. 7 (file IMG_0253)

Photographer: M. Moloney

Date: 8/7/12

Time: 1352 (EDST)

Description: View of Pond No. 3 from the eastern end looking west at Canton Drop Forge.

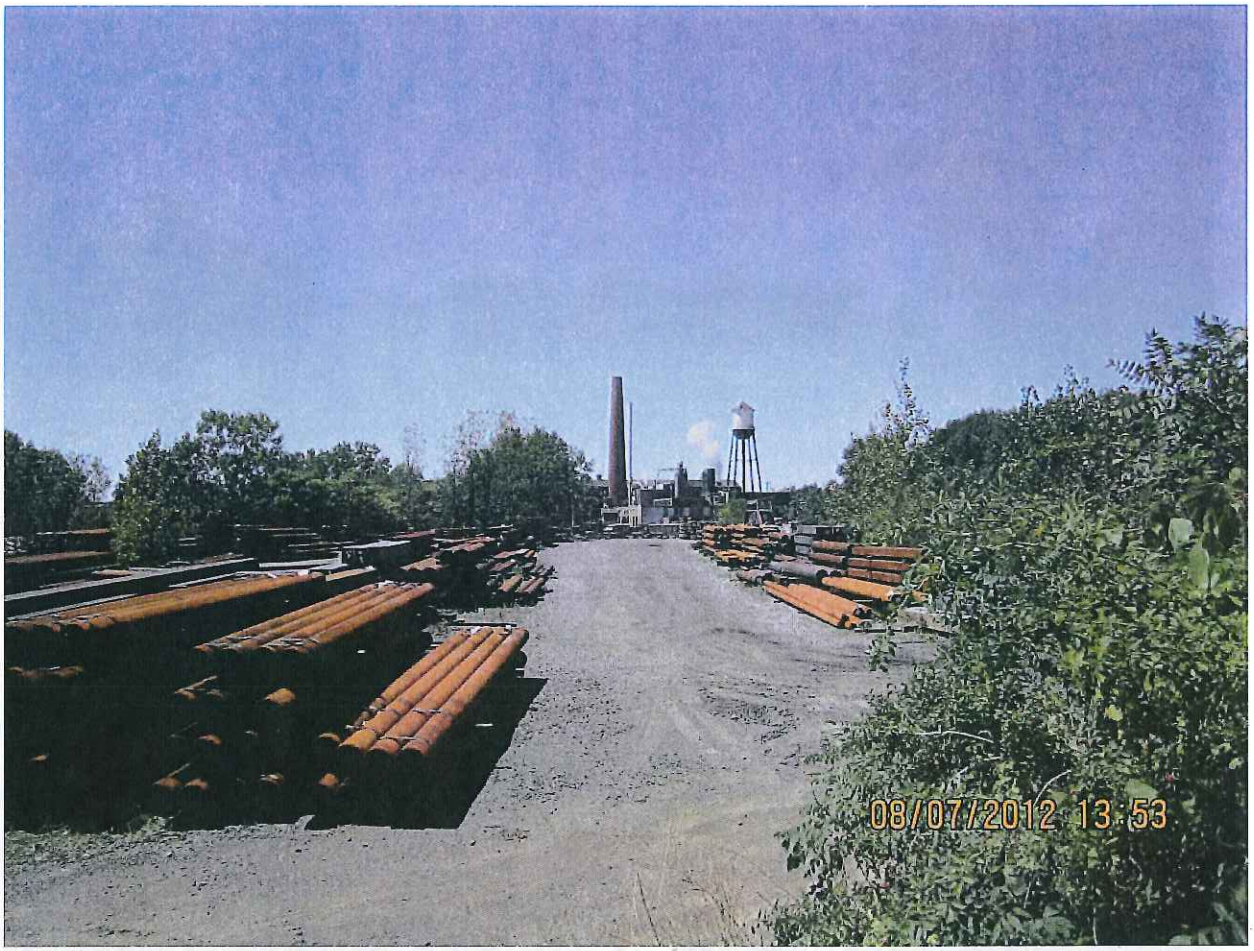
Photograph No. 8 (file IMG_0254)

Photographer: M. Moloney

Date: 8/7/12

Time: 1353 (EDST)

Description: View of Pond No. 3 from the eastern end looking west at Canton Drop Forge.



Photograph No. 9 (file IMG_0255)

Photographer: M. Moloney

Date: 8/7/12

Time: 1353 (EDST)

Description: View of Canton Drop Forge from near Pond 3 looking east.

Photograph No. 10 (file IMG_0256)

Photographer: M. Moloney

Date: 8/7/12

Time: 1400 (EDST)

Description: View of Canton Drop Forge boiler house.

Photograph No. 11 (file IMG_0257)

Photographer: M. Moloney

Date: 8/7/12

Time: 1407 (EDST)

Description: View of discharge lines to oil/water separator near boiler house

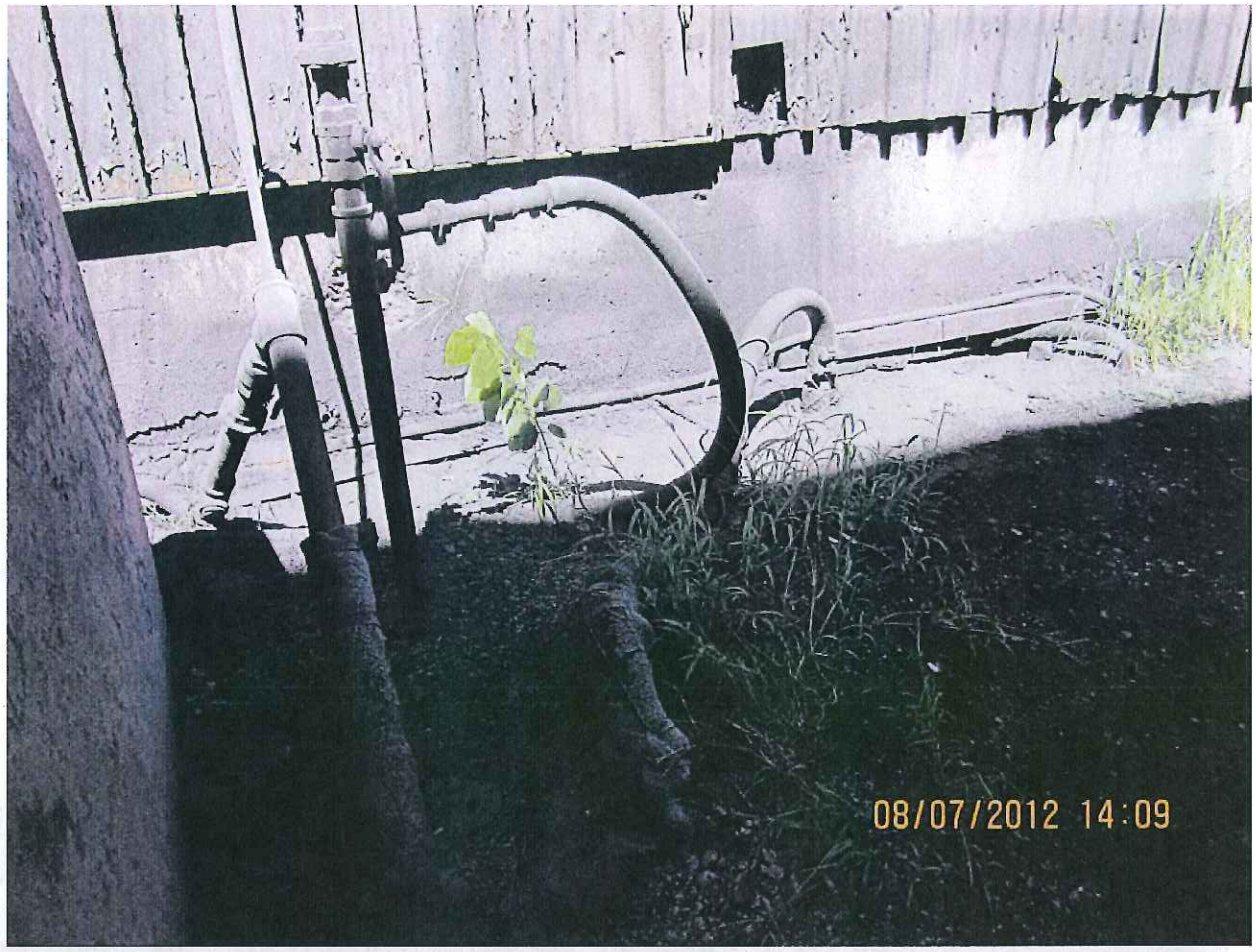
Photograph No. 12 (file IMG_0258)

Photographer: M. Moloney

Date: 8/7/12

Time: 1408 (EDST)

Description: View of the oil/water separator located near boiler house



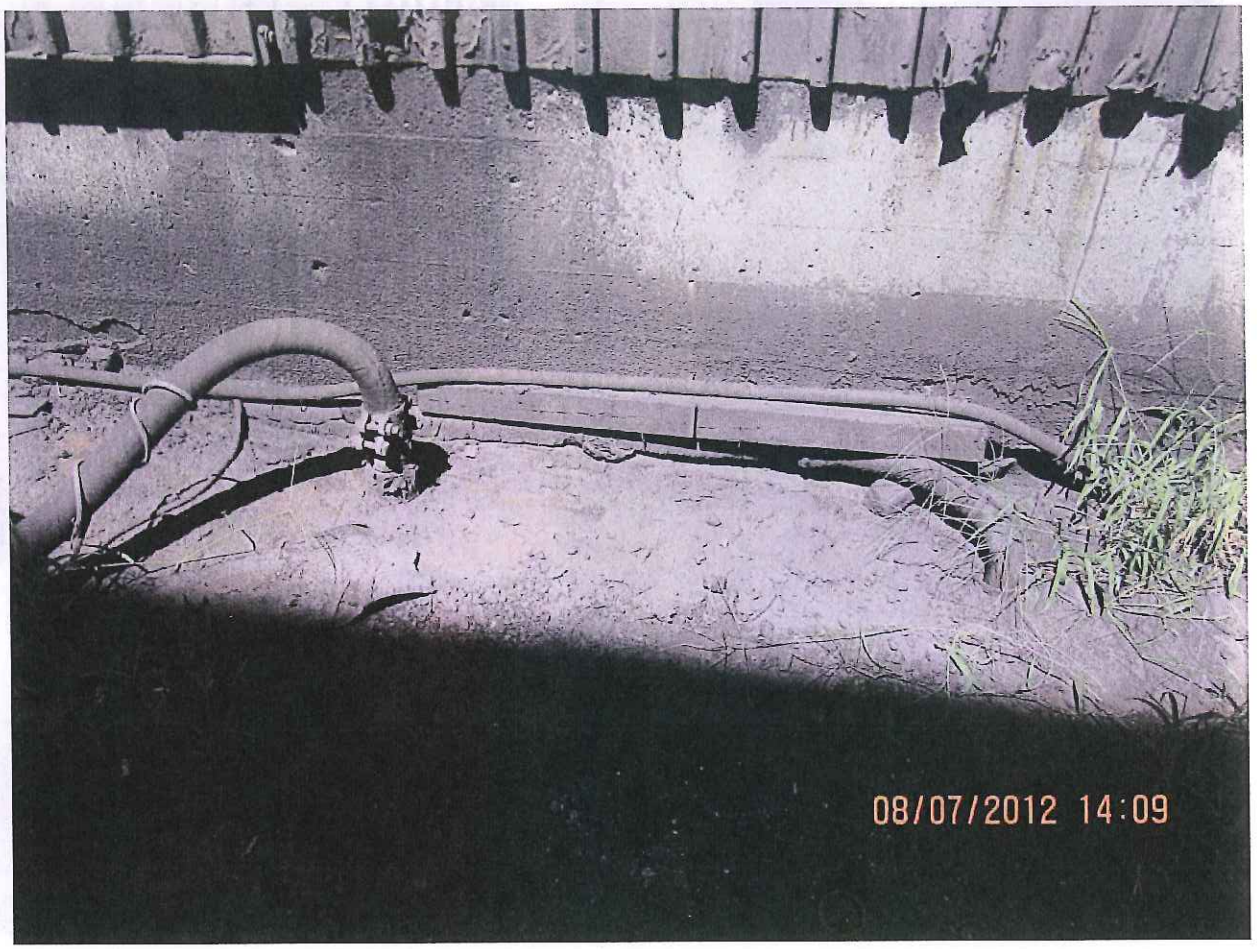
Photograph No. 13 (file IMG_0259)

Photographer: M. Moloney

Date: 8/7/12

Time: 1409 (EDST)

Description: View of the discharge line from the oil/water separator located near boiler house.



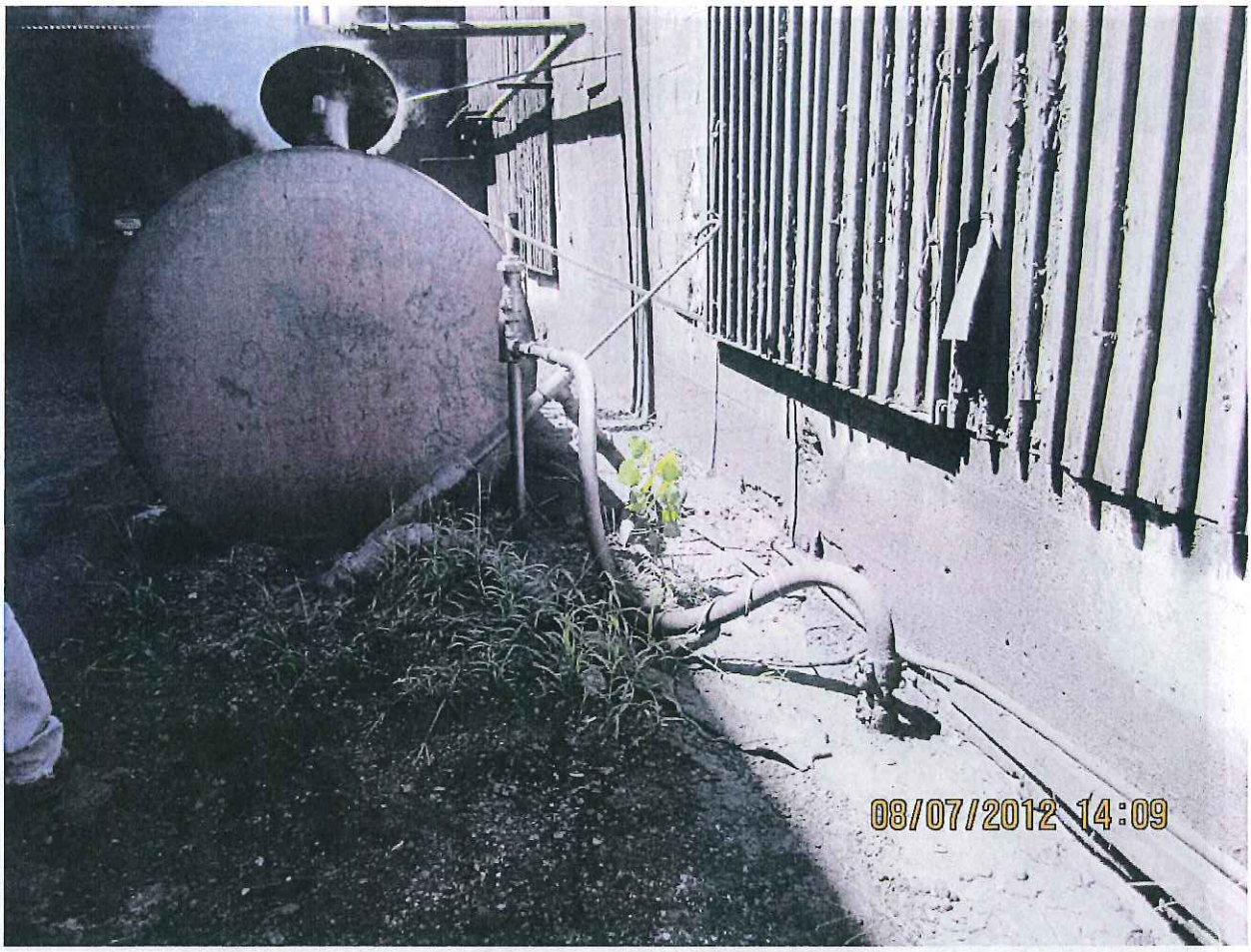
Photograph No. 13 (file IMG_0260)

Photographer: M. Moloney

Date: 8/7/12

Time: 1409 (EDST)

Description: View of the discharge line from the oil/water separator located near boiler house.



Photograph No. 14 (file IMG_0261)

Photographer: M. Moloney

Date: 8/7/12

Time: 1409 (EDST)

Description: View of the discharge line and the oil/water separator located near boiler house.

Photograph No. 15 (file IMG_0262)

Photographer: M. Moloney

Date: 8/7/12

Time: 1414 (EDST)

Description: View of a separator in the steam line system discharging to the oil/water separator.

Photograph No. 16 (file IMG_0263)

Photographer: M. Moloney

Date: 8/7/12

Time: 1414 (EDST)

Description: View of a pipeline discharging to the oil/water separator.

Photograph No. 17 (file IMG_0264)

Photographer: M. Moloney

Date: 8/7/12

Time: 1415 (EDST)

Description: View of a separator in the steam line system discharging to the oil/water separator.

Photograph No. 18 (file IMG_0266)

Photographer: M. Moloney

Date: 8/7/12

Time: 1419 (EDST)

Description: View of the lime sludge filter press

Photograph No. 19 (file IMG_0267)

Photographer: M. Moloney

Date: 8/7/12

Time: 1419 (EDST)

Description: View of the drain lines from lime sludge filter press

Photograph No. 20 (file IMG_0268)

Photographer: M. Moloney

Date: 8/7/12

Time: 1419 (EDST)

Description: View behind lime sludge filter press

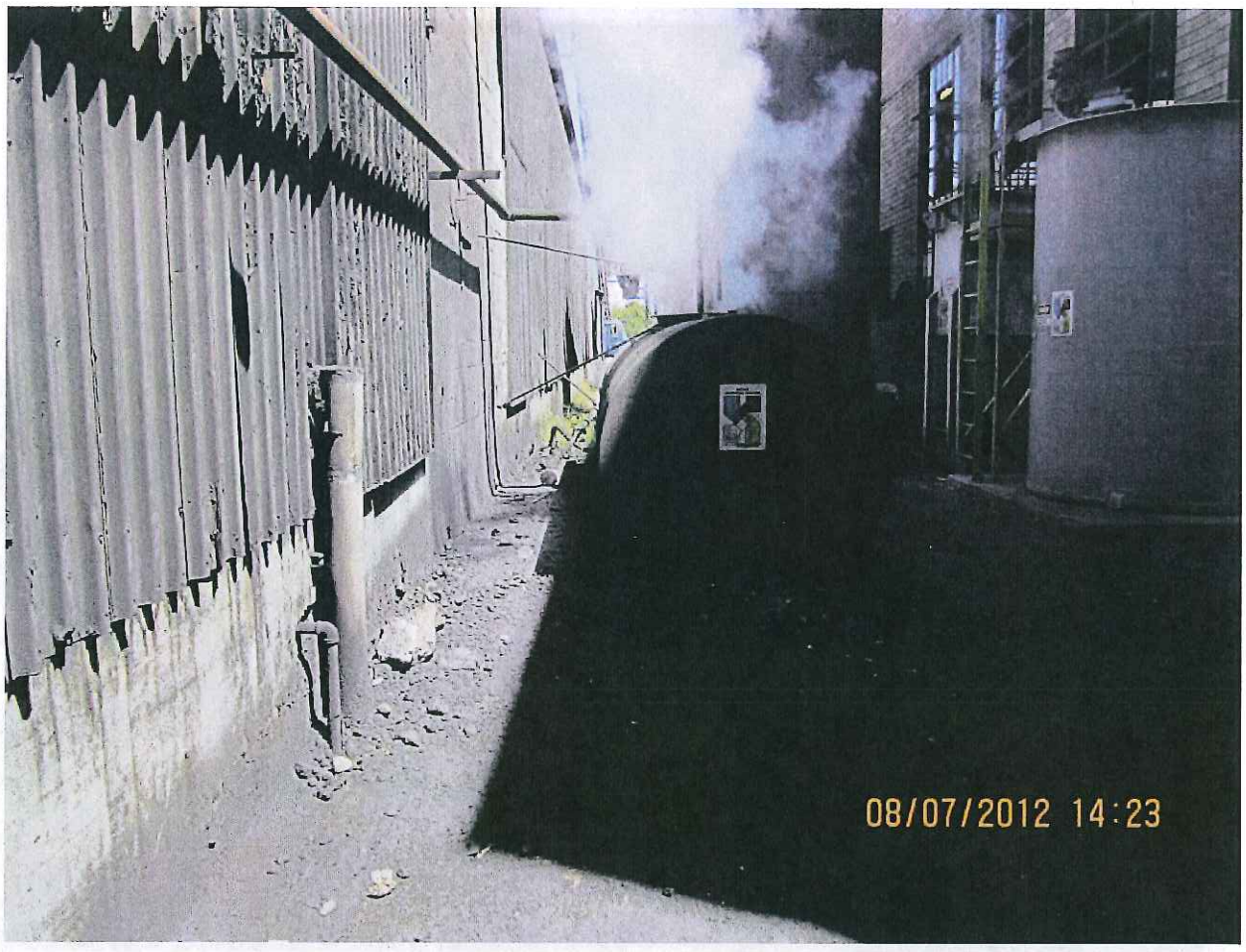
Photograph No. 21 (file IMG_0269)

Photographer: M. Moloney

Date: 8/7/12

Time: 1421 (EDST)

Description: View of the drain line from lime sludge filter press



Photograph No. 22 (file IMG_0270)

Photographer: M. Moloney

Date: 8/7/12

Time: 1423 (EDST)

Description: View of the oil/water separator located near boiler house.

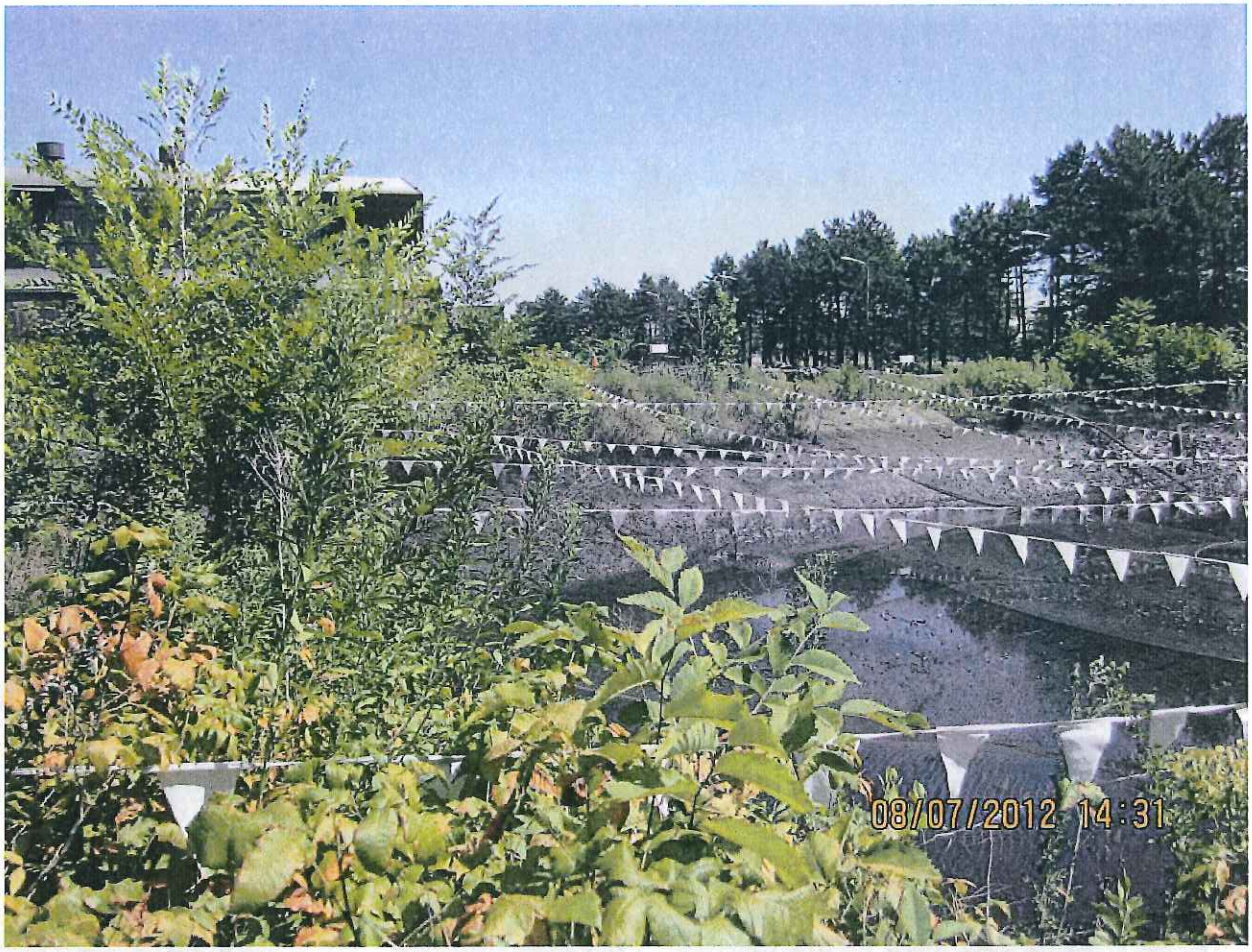
Photograph No. 23 (file IMG_0271)

Photographer: M. Moloney

Date: 8/7/12

Time: 1431 (EDST)

Description: View of Pond No. 1 at Canton Drop Forge.



Photograph No. 24 (file IMG_0272)

Photographer: M. Moloney

Date: 8/7/12

Time: 1431 (EDST)

Description: View of Pond No. 1 at Canton Drop Forge.

Photograph No. 25 (file IMG_0273)

Photographer: M. Moloney

Date: 8/7/12

Time: 1432 (EDST)

Description: View of Pond No. 1 at Canton Drop Forge.

Photograph No. 26 (file IMG_0274)

Photographer: M. Moloney

Date: 8/7/12

Time: 1432 (EDST)

Description: View of Pond No. 1 at Canton Drop Forge.

Photograph No. 27 (file IMG_0275)

Photographer: M. Moloney

Date: 8/7/12

Time: 1432 (EDST)

Description: View of Pond No. 1 at Canton Drop Forge.

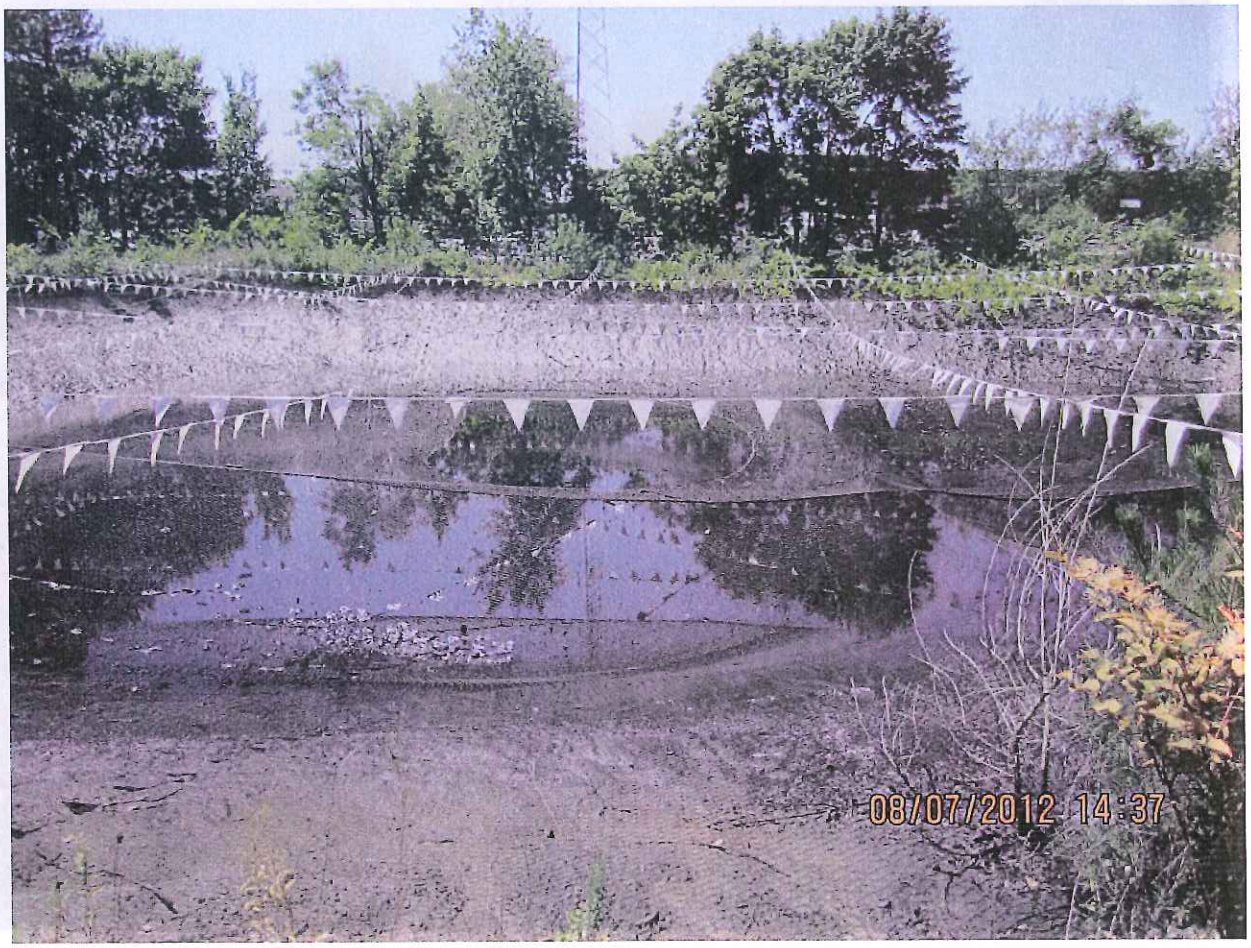
Photograph No. 28 (file IMG_0276)

Photographer: M. Moloney

Date: 8/7/12

Time: 1437 (EDST)

Description: View of Pond No. 1 at Canton Drop Forge.



Photograph No. 29 (file IMG_0277)

Photographer: M. Moloney

Date: 8/7/12

Time: 1437 (EDST)

Description: View of Pond No. 1 at Canton Drop Forge.

Photograph No. 30 (file IMG_0278)

Photographer: M. Moloney

Date: 8/7/12

Time: 1437 (EDST)

Description: View of Pond No. 1 at Canton Drop Forge.

Photograph No. 31 (file IMG_0279)

Photographer: M. Moloney

Date: 8/7/12

Time: 1438 (EDST)

Description: View of Pond No. 1 at Canton Drop Forge.

Photograph No. 32 (file IMG_0280)

Photographer: M. Moloney

Date: 8/7/12

Time: 1438 (EDST)

Description: View of Pond No. 1 at Canton Drop Forge.

Photograph No. 33 (file IMG_0281)

Photographer: M. Moloney

Date: 8/7/12

Time: 1439 (EDST)

Description: View of Pond No. 1 at Canton Drop Forge.

Photograph No. 34 (file IMG_0282)

Photographer: M. Moloney

Date: 8/7/12

Time: 1445 (EDST)

Description: View of Pond No. 1 at Canton Drop Forge.

Photograph No. 35 (file IMG_0283)

Photographer: M. Moloney

Date: 8/7/12

Time: 1453 (EDST)

Description: Storm drain at Canton Drop Forge.

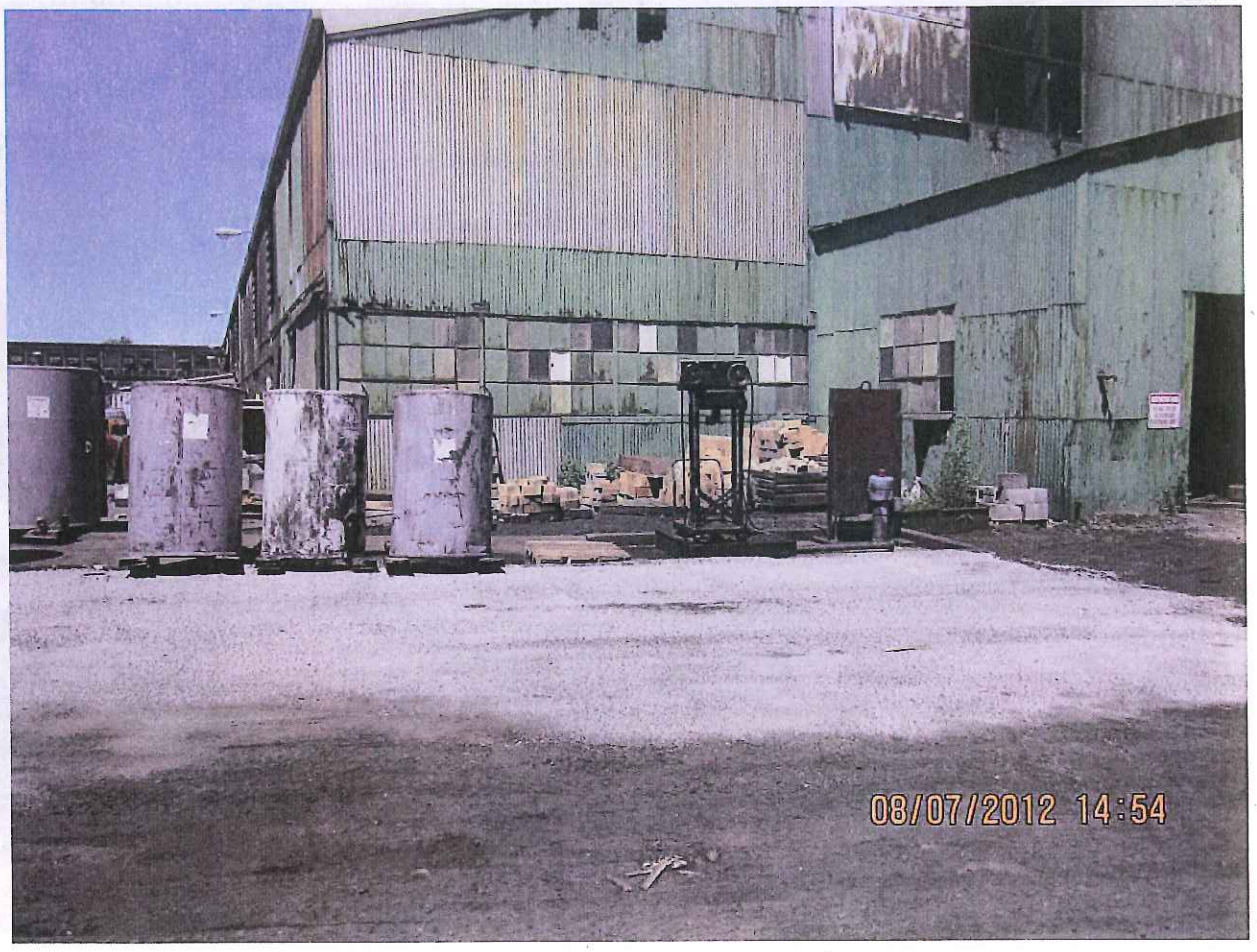
Photograph No. 36 (file IMG_0284)

Photographer: M. Moloney

Date: 8/7/12

Time: 1453 (EDST)

Description: Storm drain at Canton Drop Forge.



Photograph No. 37 (file IMG_0285)

Photographer: M. Moloney

Date: 8/7/12

Time: 1454 (EDST)

Description: View of grit chamber and oil/water separator system located at south end of the forge shop at Canton Drop Forge.

Photograph No. 38 (file IMG_0286)

Photographer: M. Moloney

Date: 8/7/12

Time: 1455 (EDST)

Description: View of grit chamber and oil/water separator system located at south end of the forge shop at Canton Drop Forge.

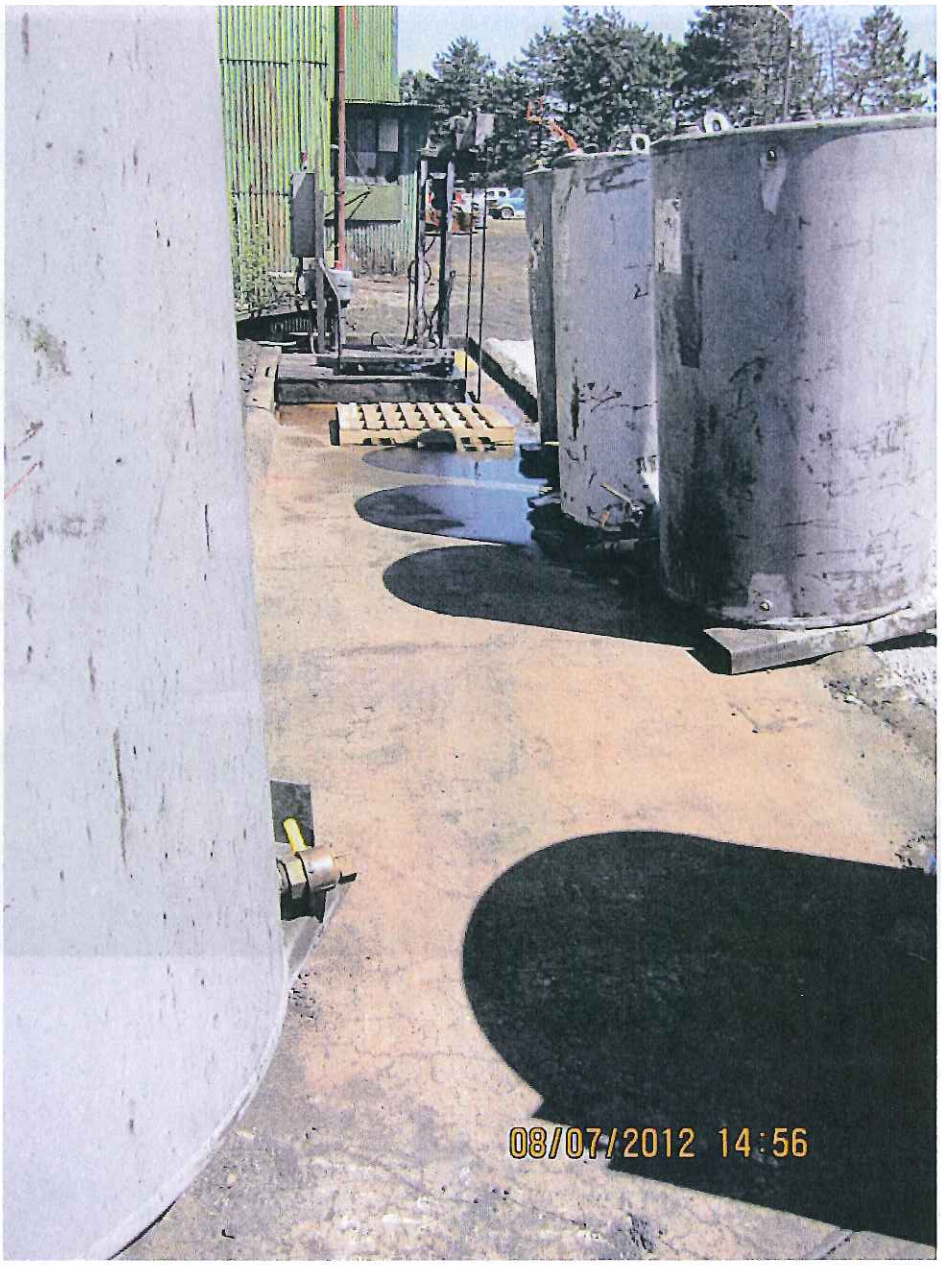
Photograph No. 39 (file IMG_0287)

Photographer: M. Moloney

Date: 8/7/12

Time: 1455 (EDST)

Description: View of grit chamber and oil/water separator system located at south end of the forge shop at Canton Drop Forge.



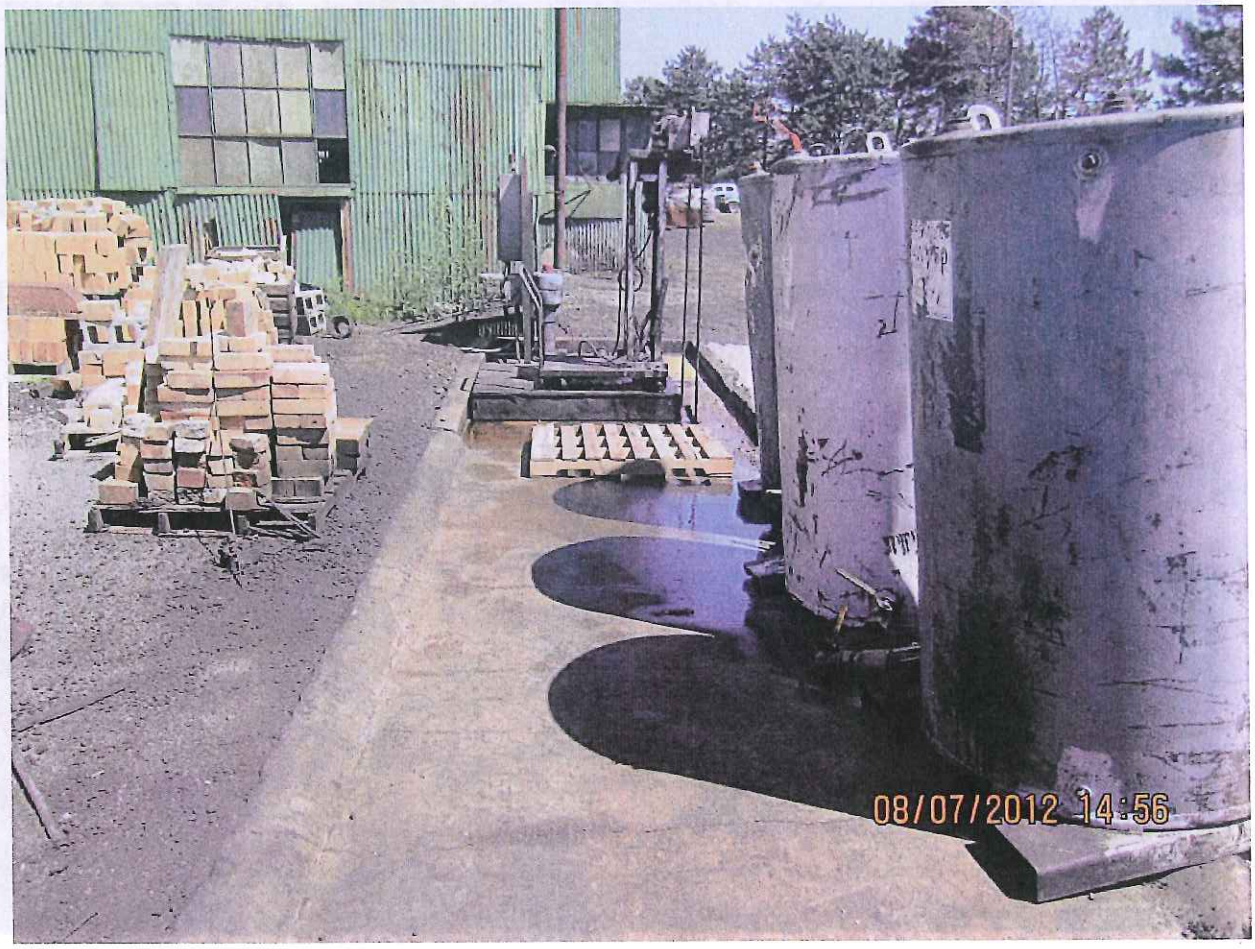
Photograph No. 40 (file IMG_0288)

Photographer: M. Moloney

Date: 8/7/12

Time: 1456 (EDST)

Description: View of grit chamber and oil/water separator system located at south end of the forge shop at Canton Drop Forge.



Photograph No. 41 (file IMG_0289)

Photographer: M. Moloney

Date: 8/7/12

Time: 1456 (EDST)

Description: View of grit chamber and oil/water separator system located at south end of the forge shop at Canton Drop Forge.

Photograph No. 42 (file IMG_0290)

Photographer: M. Moloney

Date: 8/7/12

Time: 1508 (EDST)

Description: Lubrication oil totes and a storm drain near forge shop at Canton Drop Forge.

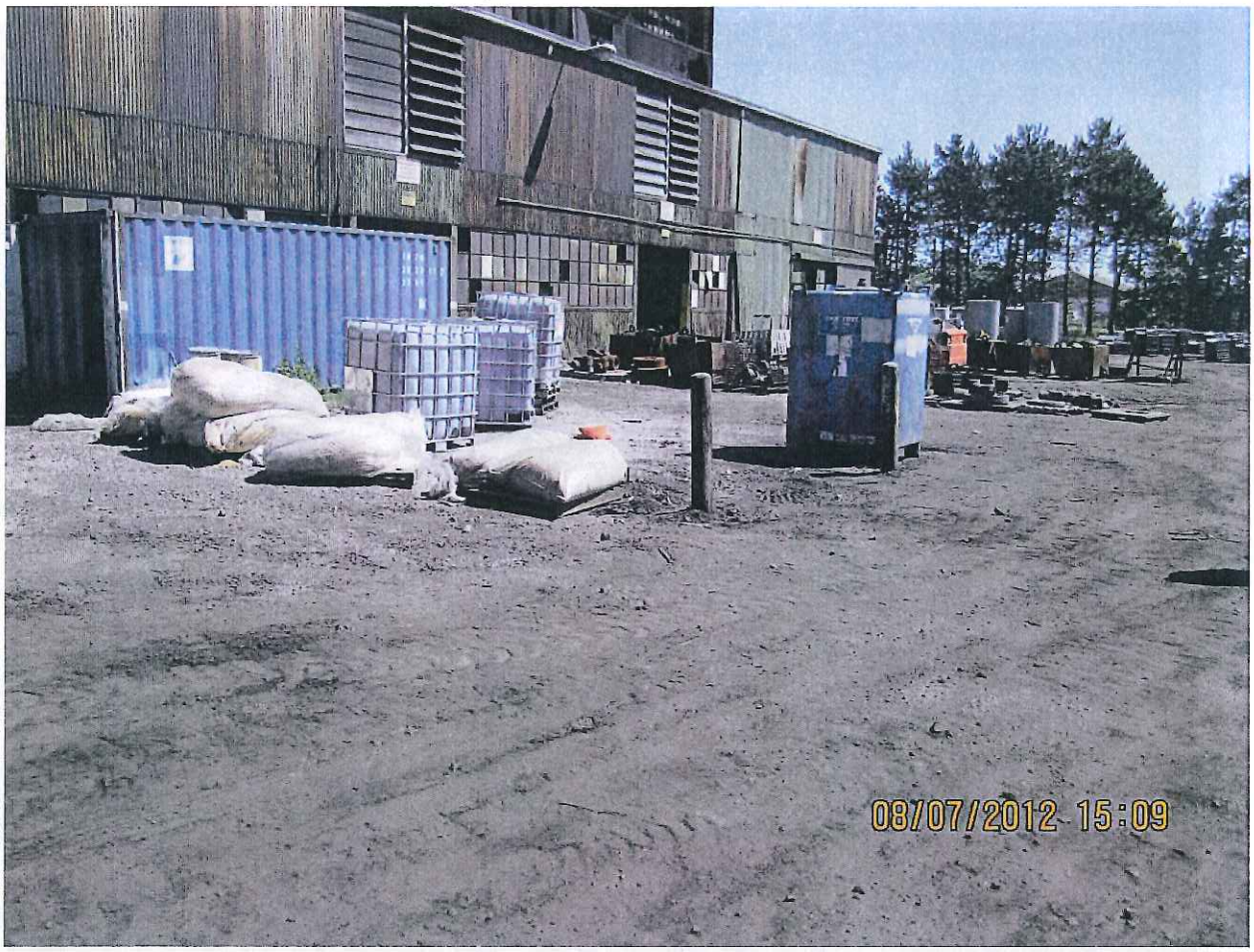
Photograph No. 43 (file IMG_0291)

Photographer: M. Moloney

Date: 8/7/12

Time: 1509 (EDST)

Description: Lubrication oil totes near forge shop at Canton Drop Forge.



Photograph No. 44 (file IMG_0292)

Photographer: M. Moloney

Date: 8/7/12

Time: 1509 (EDST)

Description: Lubrication oil totes near forge shop at Canton Drop Forge.

Photograph No. 45 (file IMG_0293)

Photographer: M. Moloney

Date: 8/7/12

Time: 1513 (EDST)

Description: Storm drain near forge shop at Canton Drop Forge.

Photograph No. 45 (file IMG_0294)

Photographer: M. Moloney

Date: 8/7/12

Time: 1545 (EDST)

Description: Oil skimmer and tank at Pond No.2 at Canton Drop Forge.

Photograph No. 46 (file IMG_0295)

Photographer: M. Moloney

Date: 8/7/12

Time: 1545 (EDST)

Description: Oil skimmer (rope skimmer) at Pond No.2 at Canton Drop Forge.

Photograph No. 47 (file IMG_0296)

Photographer: M. Moloney

Date: 8/7/12

Time: 1545 (EDST)

Description: Oil skimmer at Pond No.2 at Canton Drop Forge.

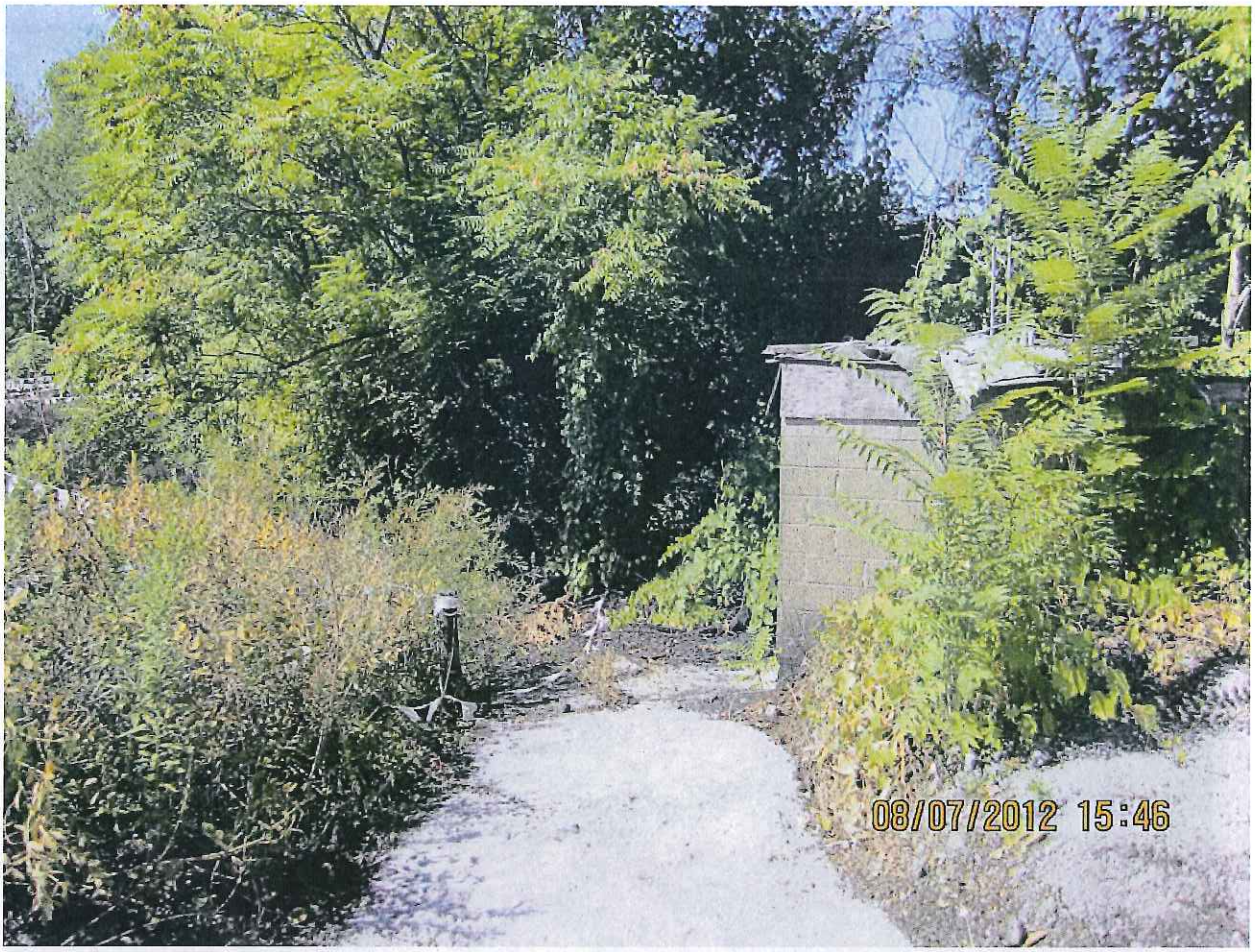
Photograph No. 48 (file IMG_0297)

Photographer: M. Moloney

Date: 8/7/12

Time: 1546 (EDST)

Description: Pond No.2 at Canton Drop Forge.



Photograph No. 49 (file IMG_0298)

Photographer: M. Moloney

Date: 8/7/12

Time: 1546 (EDST)

Description: Pump house at Pond No.2 at Canton Drop Forge.

Photograph No. 50 (file IMG_0299)

Photographer: M. Moloney

Date: 8/7/12

Time: 1546 (EDST)

Description: Oil skimmer and tank at Pond No.2 at Canton Drop Forge.

Photograph No. 51 (file IMG_0300)

Photographer: M. Moloney

Date: 8/7/12

Time: 1546 (EDST)

Description: Used oil storage in totes near Pond No.2 at Canton Drop Forge.

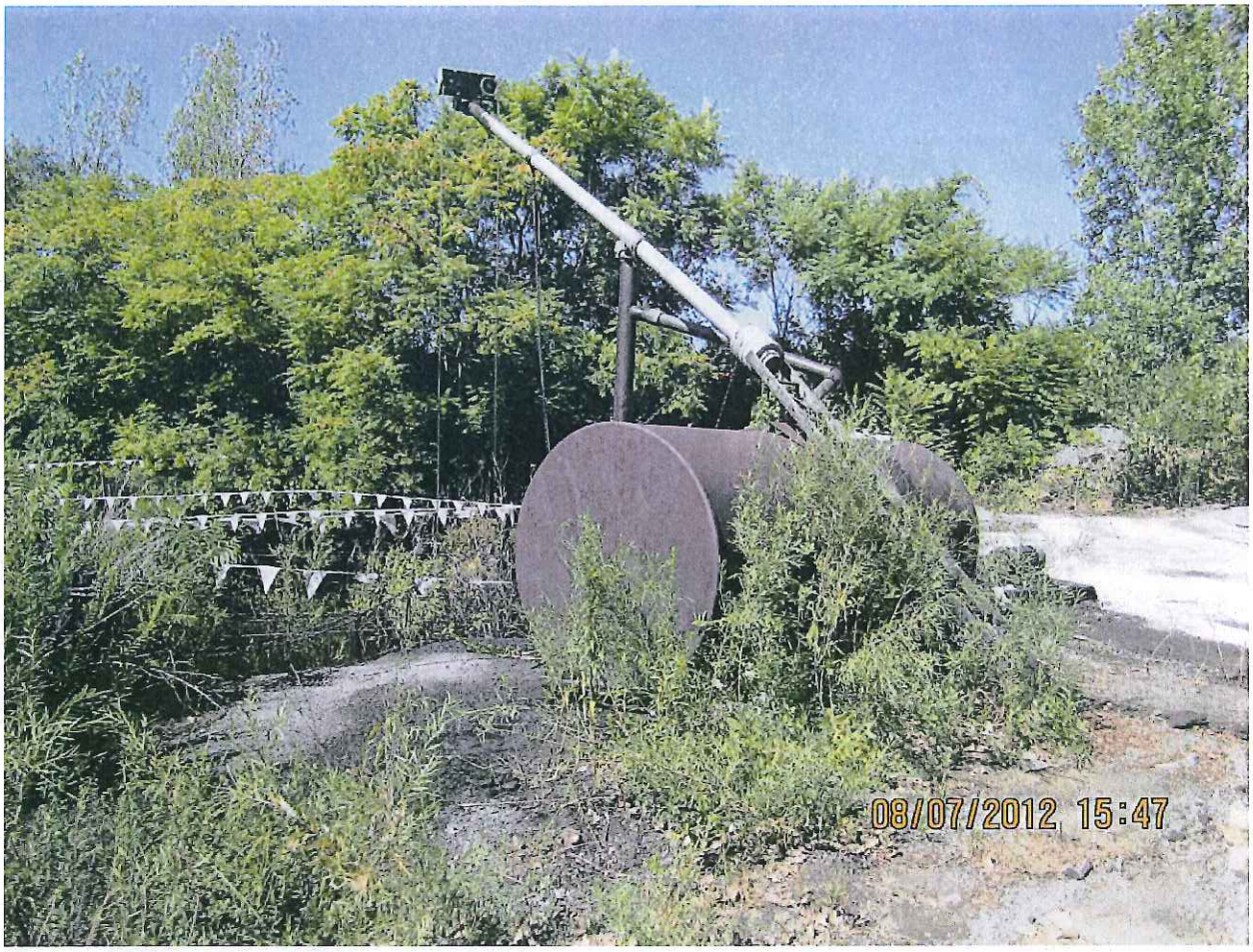
Photograph No. 52 (file IMG_0301)

Photographer: M. Moloney

Date: 8/7/12

Time: 1547 (EDST)

Description: Used oil storage in totes near Pond No.2 at Canton Drop Forge.



Photograph No. 53 (file IMG_0302)

Photographer: M. Moloney

Date: 8/7/12

Time: 1547 (EDST)

Description: Oil skimmer and tank at Pond No.2 at Canton Drop Forge.

Photograph No. 54 (file IMG_0303)

Photographer: M. Moloney

Date: 8/7/12

Time: 1547 (EDST)

Description: Oil skimmer (rope skimmer) at Pond No.2 at Canton Drop Forge.

Appendix 3

STARK COUNTY METROPOLITAN SEWER DISTRICT

JAMES R. JONES, P.E.
SANITARY ENGINEER

December 7, 2009

Canton Drop Forging and Mfg. Co.
Attn: Keith Houseknecht
4575 Southway SW
Canton, Ohio 44706

Dear Mr. Houseknecht:

Would you please send us the average number of employees at the subject address this past calendar year, do not include office personnel. This is needed to calculate sewer service charges for 2010. We also need the daily hot process water discharge . We are currently billing 10,000 gallons per day. Please reply as soon as is possible.

The enclosed envelope is for your convenience in replying.

Very Truly Yours,

Ken Sovacool
Billing Supervisor

c: file

P.O. BOX 7906 • 1701 MAHONING RD. N.E. • CANTON, OHIO 44705-7906
(330) 451-2303 • fax (330) 453-9044 • e-mail scse@co.stark.oh.us
website • www.se.co.stark.oh.us

CANTON DROP FORGE

January 19, 2010

Stark County Metropolitan Sewer District
Attn: Ken Sovacool
1701 Mahoning Road, N.E.
P.O. Box 7906
Canton, Ohio 44705-7906

Re: Account No. 09-00813-00-7

Dear Mr. Sovacool:

Thank you for your letter of December 7, 2009 requesting updated employment numbers. The average number of plant employees is 186. This number does not include any office personnel.

On January 18, 2010 powerhouse personnel timed the filling of discharge tanks from our hot process softener. The measured volume was 4,319 gallons and the filling time was 14.61 hours, or 7,095 gallons in 24 hours. Our normal schedule in the forge shop is four, ten-hour days per week, Monday through Thursday.

Sincerely,

Keith Houseknecht
Manager, Plant Engineering

Appendix 4

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 V 11	12 1 2 0 8 0 8 17	18 I	19 R	20 2

Remarks

21 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 40 69	70 1	71 N	72 N	73 74	75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Canton Drop Forge
4575 Southway St. S.W.
Canton, OH 44706

/ City of Canton WPCC
3530 Central Ave. S.E.
Canton, OH 44707
OH0024350

Entry Time/Date	Permit Effective Date
8/6/12 AM	N/A
Exit Time/Date	**Permit Expiration Date**
8/8/12 PM	N/A

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Brad Ahbe, President 330-477-4511
Sean Denman, EHS Manager
Keith Houseknecht, Retired Process Engineer

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

No permit (IU or NPDES) for plant discharge

Name, Address of Responsible Official/Title/Phone and Fax Number

Brad Ahbe, President
Canton Drop Forge
4575 Southway St. S.W.
Canton, OH 44706

Contacted ☑ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☐	Permit	☐	Self-Monitoring Program	☐	Pretreatment
☐	**Records/Reports**	☐	Compliance Schedules	☐	Pollution Prevention
☑	Facility Site Review	☐	Laboratory	☐	Storm Water
☑	Effluent/Receiving Waters	☑	Operations & Maintenance	☐	Combined Sewer Overflow
☐	Flow Measurement	☐	Sludge Handling/Disposal	☐	Sanitary Sewer Overflow

☐ MS4

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
☐☐☐☐☐	
☐☐☐☐☐	
☐☐☐☐☐	
☐☐☐☐☐	

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
MARK E. MOLONEY Mark E Moloney	USEPA/RS-OECA/440-250-1709 440-250-1750 FAX	2/25/13

Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A Performance Audit
B Compliance Biomonitoring
C Compliance Evaluation (non-sampling)
D Diagnostic
F Pretreatment (Follow-up)
G Pretreatment (Audit)
I Industrial User (IU) Inspection
J Complaints
M Multimedia
N Spill
O Compliance Evaluation (Oversight)
P Pretreatment Compliance Inspection
R Reconnaissance
S Compliance Sampling
U IU Inspection with Pretreatment Audit
X Toxics Inspection
Z Sludge - Biosolids
Combined Sewer Overflow-Sampling
$ Combined Sewer Overflow-Non-Sampling
+ Sanitary Sewer Overflow-Sampling
& Sanitary Sewer Overflow-Non-Sampling
\ CAFO-Sampling
= CAFO-Non-Sampling
2 IU Sampling Inspection
3 IU Non-Sampling Inspection
4 IU Toxics Inspection
5 IU Sampling Inspection with Pretreatment
6 IU Non-Sampling Inspection with Pretreatment
7 IU Toxics with Pretreatment
! Pretreatment Compliance (Oversight)
@ Follow-up (enforcement)
{ Storm Water-Construction-Sampling
} Storm Water-Construction-Non-Sampling
: Storm Water-Non-Construction-Sampling
~ Storm Water-Non-Construction-Non-Sampling
< Storm Water-MS4-Sampling
- Storm Water-MS4-Non-Sampling
> Storm Water-MS4-Audit

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)
B ---- EPA (Contractor)
E — Corps of Engineers
J — Joint EPA/State Inspectors—EPA Lead
L ---- Local Health Department (State)
N — NEIC Inspectors
O— Other Inspectors, Federal/EPA (Specify in Remarks columns)
P— Other Inspectors, State (Specify in Remarks columns)
R — EPA Regional Inspector
S — State Inspector
T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

E0012	Failure to Submit DMRs		D0R18	Failure to apply for a notice of termination
E0016	Failure to submit required report (non-DMR, non-pretreatment)		B0R12	Failure to Conduct Inspections
E0013	Improper/ Incorrect Reporting		B0C17	Failure to develop any or adequate SWPPP/SWMP
E0011	Late Submittal of DMRs		B0C18	Failure to Implement SWPPP/SWMP
E0014	Noncompliance with Section 308 Information Request		B0R41	Failure to Maintain Records
Pretreatment			C0R11	Failure to Monitor
C0012	Baseline Monitoring Report Violation		BR19A	Failure to properly install/implement BMPs
B0P12	Failure to Conduct Inspections		BR19B	Failure to properly operate and maintain BMPs
B0P11	Failure to Develop/Enforce Standards		D0R12	Failure to submit required permit application information
B0013	Failure to Enforce Against I/U		E0R16	Failure to submit required report (non-DMR)
B0015	Failure to Establish Local Limits		A0R22	Narrative effluent violation
C0013	Failure to Establish Self-Monitoring Requirements		E0R14	Noncompliance with section 308 Information Request
B0014	Failure to Issue SIU Permits		A0R12	Numeric Effluent Violation
B0016	Failure to Meet Inspection and Sampling Plan for SIUs		B0R42	Violation of a milestone in an order
E0015	Failure to submit required report (non-DMR)		**Storm Water MS4**	
B0P40	Improper Chemical Handling		D0M11	Discharge without a permit
A0014	IU Violation of Pretreatment Standards		D0M18	Failure to apply for a notice of termination
CAFO			B0M12	Failure to Conduct Inspections
B0A19	Best Management Practice Deficiencies		B0M17	Failure to develop any or adequate SWPPP/SWMP
B0038	Direct Animal Contact with Waters of US		B0M18	Failure to Implement SWPPP/SWMP
D0A11	Discharge without a permit		B0M41	Failure to Maintain Records or Meet Record Keeping
B0A12	Failure to Conduct Inspections		C0M11	Failure to Monitor
B0032	Failure to Develop any or adequate NMP		BM19A	Failure to properly install/implement BMPs
B0033	Failure to Implement NMP		BM19B	Failure to properly operate and maintain BMPs
B0A41	Failure to Maintain Records or Meet Record Keeping Requirements		D0M12	Failure to submit required permit application information
B0043	Failure to meet order final compliance date		E0M16	Failure to submit required report (non-DMR)
C0A11	Failure to Monitor		A0M22	Narrative effluent violation
D0A12	Failure to submit required permit application information		E0M14	Noncompliance with section 308 Information Request
C0019	Failure to Test Manure		A0M12	Numeric Effluent Violation
B0A40	Improper Chemical Handling		B0M42	Violation of a milestone in an order
B0A23	Improper Land Application		**Storm Water Non-Construction**	
B0039	Improper Manure Handling (not including land application)		D0N11	Discharge without a permit
B0037	Improper Mortality Management		D0N18	Failure to apply for a notice of termination
B0036	Improper O&M of Storage Facility		B0N12	Failure to Conduct Inspections
E0A13	Improper/Incorrect reporting		B0N17	Failure to develop any or adequate SWPPP/SWMP
B0034	Insufficient Buffers/Setbacks		B0N18	Failure to Implement SWPPP/SWMP
B0035	Insufficient Storage Capacity		B0N41	Failure to Maintain Records
A0A22	Narrative effluent violation		C0N11	Failure to Monitor
E0A16	No Annual Report Submitted		BN19A	Failure to properly install/implement BMPs
C0020	No Depth Marker		BN19B	Failure to properly operate and maintain BMPs
E0A14	Noncompliance with section 308 Information Request		D0N12	Failure to submit required permit application information
A0A12	Numeric effluent violation		E0N16	Failure to submit required report (non-DMR)
A0019	Production Area Runoff		A0N22	Narrative effluent violation
B0A42	Violation of a milestone in an order		E0N14	Noncompliance with section 308 Information Request
			A0N12	Numeric Effluent Violation
			B0N42	Violation of a milestone in an order

* N. B. The codes and code names listed herein may change over time. Please consult ICIS-NPDES and PCS system documentation for updated lists.

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